



# Audubon WASHINGTON

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February 28, 2002

Eric Friedli  
Planning and Operations Manager, Sand Point Magnuson Park  
Department of Parks and Recreation  
7400 Sand Point Way NE  
Seattle, WA 98115

Dear Eric

Washington Wetlands Network (Wetnet) is the wetlands program of the Washington State Audubon Field Office (Audubon Washington). Audubon Washington comprises 25 local Audubon chapters, their 22,000 members, and the Washington State Office of National Audubon Society. Together we conserve and restore Washington's natural ecosystems, focusing on birds, other wildlife, and their habitats, for the benefit of humanity and the earth's biological diversity.

This letter is in response to the Draft Environmental Impact Statement (DEIS) for Sand Point Magnuson Park, Drainage Wetland/Habitat Complex and Sports Fields/Courts Project. As an environmental organization we have focused our attention and comments on the Wetland/Habitat Complex of the DEIS.

## Habitat Complex

**We support the intent of the Park Plan to provide natural habitat — through the wetlands/habitat complex — at the heart of Magnuson Park.** In the modern, developed, world we are increasingly surrounded by technology and insulated from the natural environment that ultimately supports both ourselves and our technology. The proposed habitat complex at Magnuson Park will provide a welcome respite from the demands of the technological world. Because of its location in a popular city park, it will also serve as an entry point to the natural world for those otherwise unaware of the environment and its importance. It is very likely that people who come to the park for the more active recreation being provided will also take advantage of the unstructured space and opportunities provided by the habitat complex. There is enormous potential to educate Seattle citizens and visitors about the benefits provided by the natural environment, the need to protect that environment, and the opportunities to do so.

But at Audubon we are also very aware of the damage that people can do to natural areas — often unknowingly. In a densely urbanized area, such as the City of Seattle, the needs of the human community must be carefully balanced against the needs of wild communities. In a heavily used park, like Magnuson Park, no one habitat area can be expected to fulfill all the habitat requirements of a full suite of pre-settlement flora and fauna. **We fully support the proposal to limit access to the internal portion of the habitat complex in an effort to provide sheltered habitat for species that are easily disturbed.** But we are concerned that the effects of some other components of this plan — especially the sports field lighting — may

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offset that effort by causing excessive disturbance at the edges of the habitat area and concentrating wildlife in the internal areas.

The DEIS does not adequately address the possible impacts to the habitat complex from increasing the number of visitors to the Park. At least some visitors—and their dogs—are likely to trespass on the protected part of the habitat complex. The monitoring plan for the park should include monitoring of any trespass and impacts. It should also include contingency actions to repair any damage and prevent future trespass/impacts.

Past efforts to create new or restore old wetland systems across the country have met with mixed success and fail more often than not. Recent studies conducted in King County and across the state show that failure is also a common result here. Most of the wetlands studied for these reports were created or restored as mitigation for other impacts, so their failure dealt a double-blow to our natural resources. But a large and visible restoration project, on public land, such as that proposed for Magnuson Park requires no less scrutiny than any mitigation project. **We strongly recommend that a monitoring component be incorporated into the planning for the proposed restoration of wetlands and other habitat in Magnuson Park.** This monitoring plan should include an adaptive management component so that erroneous assumptions can be identified and corrected.

**We support the development of natural vegetation at Magnuson Park to provide an ecologically significant and sustainable habitat area.** The DEIS needs more than a few references to the Magnuson Vegetation Management Plan, so that the citizens of Seattle can be assured that the planned habitat area will be sustainable and significant. It is our understanding that the Vegetation Plan does not, in any case, include the wetland portions of the habitat complex, so wetland vegetation must be addressed elsewhere. Establishing viable plant communities is a very important component of successful wetland restoration. We recommend using native plants, with rigorous attention to controlling invasive species early in the planned restoration. This DEIS proposes “phasing” the habitat restoration work along with the phasing of the sports field construction. Extra care will be needed to ensure that the restored areas are not disturbed during further construction work in other parts of the habitat complex.

## Drainage

**The impact of contaminants draining from the sports fields and the dogs off-leash area should also be monitored.** We support the use of constructed wetlands to provide a final “polishing” of water draining from the sports fields, in this context. But we are concerned that contaminants — including heavy metals — could build up in the drainage swales and move into the wetlands. This would have a significant detrimental impact on the habitat that could be provided by those wetlands. The number and type of species of flora and fauna would change and most likely decline. This water will ultimately drain into Lake Washington. The fish habitat being created at the lagoon area would be negatively impacted by contaminated water draining from the sports fields. Contaminated water draining from the dogs off-leash area also has the potential to impact not only wildlife and fish habitat but also human health. Off-leash areas concentrate dogs into a relatively small area. While this limits their impact on other parts of the park it also concentrates any pathogens that might be carried on or in the animals. This potential problem should not be overlooked and a monitoring program should be set up so that problems can be identified early and corrected. The monitoring program should include regular testing of the water draining from the off-leash area for both *E. coli* and *Giardia*.

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SEPA5

## Sports Field Lighting

The effects of the sports lighting on the flora and fauna of the habitat complex should be included as a priority of in the monitoring plan, especially given the paucity of information available on lighting impacts on urban wildlife. The configuration of the habitat complex in relation to the sports field lends itself to ongoing research, which could yield very useful results, and would also provide educational opportunities at the park.

**We are concerned about the unmitigated impacts of lighting on the habitat complex.** In urban areas it is especially important to balance the needs of people with wildlife populations. The Park has not provided, in this DEIS, sufficient rationale for lighting all of the sports fields until 11pm at night. This will significantly change the night-time character of the neighborhood and will impact both human and wild residents. It also would increase effective daylight hours by 2.5 up to 7 hours depending on the season. This will have an undoubted — if as yet unquantifiable — effect on wildlife in the habitat area. The Park should explore ways to mitigate for the residual impact from the sports field lighting system. For example, the baseball field closest to the wetland could be left un-lit, thus reducing some of the spill effects. Reducing the duration and amount of lighting during bird migration might also reduce impacts to migratory birds, which can be substantial.

While the impact of urban lighting on wildlife has been poorly studied, enough is known to make some predictions of the likely impact on birds, mammals and insects in and around the Park. It is not clear from the DEIS whether the lighting impacts have been given sufficient weight when predicting the habitat improvements likely to come from the proposed restoration work. We strongly suggest that the following be given serious consideration in developing the Final Environmental Impact Statement:

- strong lights attract insects and bats who prey on those insects:
  - what are the likely impacts on the insect population?
  - how will this effect amphibians, birds and other species that prey on insects?
  - what are the likely long-term impacts on the ecology of the habitat complex?
- the extended daylight effect of the lighting is likely to impact the mating behavior of wildlife in the habitat complex, especially amphibians and birds, as well as other behaviors, such as the timing of molting, extent of foraging and patterns of fat deposition:
  - how will this impact the final complement of species in the habitat area?
- will the glare from the lighting impact zooplankton migration in the lagoon area?
- what is the likely impact on salmon using the lagoon for feeding and shelter?

At a minimum, lighting impacts should be monitored closely. An adaptive management component should be included in the park management plan, so that the use of lighting for the sports fields can be changed as needed to reduce impacts to the habitat complex.

## Mitigation

At Wetnet, we regret the loss of any wetland habitat, as this is such a scarce resource, especially in urban areas. We therefore cannot support filling wetlands to provide sports fields in a city with so many — especially as the DEIS does not conclusively show the need for these

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extra sports fields in this particular location. We were pleased to find that the Parks Department is fulfilling its legal obligation to avoid wetland habitat (the 2.7 acre forested wetland and other wet meadows on site).

It is not clear from the DEIS exactly how much compensatory mitigation will be provided to mitigate for the wetlands filled for the sports field. Not all of the elements listed as compensatory mitigation can be properly considered as such. For example, educational signage, while useful to human visitors does not, in itself, increase the habitat function of the wetland area and does not compensate for impacts to the other wetlands on site. Enhancement of wetlands, such as increasing the duration and extent of water in the remaining wet meadow, usually receives a higher mitigation ratio as wetland acres are still being lost. A scientific function assessment method should be used to assess the degree of enhancement that will result. Maintaining existing on-site habitat does not compensate for the wetland impacts. The Parks Department should be protecting existing habitat, as a community resource for Seattle residents and cannot expect to get extra credit for doing so.

**We strongly recommend that the FEIS show precisely what is being done to compensate for impacts to existing wetlands by restoring, enhancing and creating wetlands and include the proposed replacement ratios.** This should include information on the proposed hydrologic regime, vegetation community or species assemblages, habitat features, construction timelines, installation processes and the monitoring/maintenance plan. Construction of the wetlands construction should occur before the sports fields to provide up-front mitigation as required by local, state and federal regulations

## Conclusion

We support the Seattle Parks Department in its efforts to increase and improve wildlife habitat in the City of Seattle — city residents have also consistently shown their support for such improvements. The proposed habitat complex can also be used to educate city residents about the environment of Seattle and its environs. In addition, the Parks Department could educate citizens by showing how habitat can be provided in a heavily used park, balancing the needs of the human park users with the needs of its wildlife population. The proposal for Magnuson Park has the potential to do that — if some improvements, as suggested above, are made.

Thank you for the opportunity to comment.

Sincerely



Bríd Nowlan

Wetnet Science Director

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WET2  
CONT



## References

Longcore, Travis, Ph.D. and C. Rich. J.D., M.A. A review of the ecological effects of road reconfiguration and expansion on coastal wetland ecosystems.

Mockler, A., L Dasey, M. Bowles, N. Gillen and J. Hansen. 1998. Results of Monitoring in King County Wetland and Stream Mitigations. King County Department of Development and Environmental Services, King County WA.

Nightingale, Barbara & Charles Simenstad. Artificial night-lighting effects on salmon and other fishes in the Northwest. University of Washington, School of Aquatic and Fishery Sciences.

Outen, Alan R. The possible ecological implications of artificial lighting. Hertfordshire Biological Records Centre. 1998.

The Urban Wildlands Group, Inc. November 14, 2001.  
Impact of outdoor lighting on man and nature. Health Council Report No. 2000/25E. The Hague, Netherlands. November 30, 2000.

The Urban Wildlands Group. Ecological consequences of artificial night lighting: bibliography. <http://www.urbanswildlands.org/nightlightbiblio.html>. January, 2002.

**Eric Friedli - DEIS Comments of**

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**From:** "Doug Ancona" <dougancona@earthlink.net>  
**To:** "Eric Friedli" <Eric.friedli@ci.seattle.wa.us>  
**Date:** 2/28/2002 11:10 PM  
**Subject:** DEIS Comments of  
**CC:** "Fletcher Shives" <fgshives@earthlink.net>, <Cope44@aol.com>

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Eric, These comments on the DEIS for Sand Point Magnuson Park are being submitted on behalf of the Citizens for Wildlife and Neighborhoods. Doug

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## OFFICIAL COMMENTS

## Sand Point Magnuson Park

## Drainage, Wetland/Habitat Complex and Sports Fields/Courts Project

## Draft Environmental Impact Statement

## Impact of High Intensity Lights from 11 sports fields:

**Massive Scale of the Sports field Lighting**

1.) The DEIS proposes to erect 80 light poles to serve 11 synthetic-surfaced sports fields. Poles will "typically be 75 feet high...although some 65 foot and 85 foot poles would be used on the five baseball fields." "Each pole would support a light fixture array of 6-15 individual luminaries." This would involve a total of "640 luminaires" at "1000 watts" each for a total of 640,000 watts of light. Periods of light system use are expected to range from 2.5 to 7 hours per day. Lights are expected to be on until 11:00 pm nightly. **The proposed plan will be the largest public parks sports fields complex in Seattle. If completed as proposed, the Magnuson Park site would become a veritable industrial area of athletic fields with 23 % of the present number of illuminated fields in the city – 11 at Magnuson versus 47 now throughout the city.**

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SEPA3**DEIS Failure to Propose Off-site Alternatives (p.2-50)**

2.) The DEIS fails to consider off-site alternatives on the basis that the project proponent, through the Joint Athletic Fields Development Plan (JAFDP), did not propose any other sites. By failing to consider off-site alternatives, the EIS is just a rubber stamp of approval for the Sand Point Magnuson Sports Fields Project. Why prepare an EIS if the proponent plans to do only what is proposed regardless of the environmental impact or the availability of lesser impact alternatives or other mitigation? The clear purpose and intent of a valid EIS is to give the decision makers the information needed to make informed decisions -- which they can do only if the EIS is thorough and complete in its consideration. And this DEIS is not thorough and complete without off-site alternative evaluation.

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The State Environmental Policy Act exempts only private projects from off-site alternative evaluation. **The state SEPA Guidebook specifically says that public projects are required to consider off-site alternatives.**

Alternatives must be only reasonable and capable of being done to merit consideration. Plainly, it is reasonable and practicable to provide lights at other athletic fields in the city. Indeed, spreading the illuminated fields throughout the city, with no one site having a

large number, could have positive environmental benefits: reduced traffic and noise at any one site; reduced energy and less pollution as a result of reduced travel; greater opportunity for other neighborhoods to enjoy the stated benefits of illuminated fields; reduced light, glare, and sky glow at any one site; etc.

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SEPA1  
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### 3.) Failure of the DEIS "Lesser Alternative" Proposal (p.2-42)

The DEIS states that it is a lesser capacity alternative when in fact it eliminates none of the highest output lights or lights with the relative greatest impact on the adjacent environment. It retains all of the baseball fields; including two baseball fields without full cut-off lights, which will face residential areas both within and outside of the park.

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SEPA2

The lesser capacity alternative proposes almost three times the average number of illuminated fields currently at any individual site in the city (seven lit fields compared to an average of 2.5 lit fields at 19 other sites in the city).

**An honest and fair reduced capacity alternative would have no more than three illuminated fields** (the rounded-up average of all present sites) with none of those being baseball fields.

#### Residential

##### Impact of Lights:

4.) One fourth of the lights will be **"shielded conventional lighting"** on 75-85 foot poles at two of the largest baseball fields. **The outfield lights from these two fields will be facing directly into the hillside homes of View Ridge residents and the DEIS does NOT include a lesser alternative to reduce the impact of this lighting.**

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SEPA3

5.) The DEIS states that "Virtually all of the single-family residential area west of Sand Point Way is located west of the Burke Gilman trail and above elevation 125 feet, and would have limited or no exposure to direct glare from the sports field lights." **During the lighting demonstrations residents were able to witness significant glare from their living rooms and bedrooms. What will it be like when we jump from a demonstration of 3 light poles to the proposed 80 light poles? Who wants to sleep in a bedroom subjected to the glow from 640, 000 watts of lights until 11pm every night?**

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6.) The DEIS claims that "Based on the existing urbanized environment and the limited magnitude expected for the project, the impact of the project on sky glow evident in the surrounding area would likely be insignificant." **The proposed proliferation of artificial lighting threatens to block our view of the moon and stars. Although the neighboring hillside has ambient street lighting, we will view the sports lights against a dark lake. How can the effects of sky glow be insignificant when the parks department plans to turn on 640,000 watts of light until 11pm every night?**

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L&G1

## The DEIS Fails to provide data on Lighting Impact

7.) The DEIS fails to provide data on the effects of light, glare, and sky glow on the adjacent neighborhood and natural environment under the ruse that they are not obtainable. In fact, critical data are obtainable: albedo (the brightness of an object) is measurable and quantifiable; reflectance (how much an object reflects light) is measurable and quantifiable; atmospheric scattering (which causes the air around a luminaire to appear lit) is measurable and quantifiable. These parameters, individually and collectively, will determine how the proposed lighting impacts the environment. The “latest technology” for lighting will do little or nothing to alter these fundamental parameters of the environment into which the lights are placed. **Lighting must be measured and quantified under wet and dry conditions and expressed in terms understandable to the lay reader to render an informed decision.**

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L&G1

**The DEIS fails to consider the visual perception of light.** Of great significance, but not considered, is the human perception of contrast between light and dark objects. This factor will be especially significant for the neighborhood to the west and south of the park. Although direct glare may not exceed a certain arbitrary level at adjacent properties, observers at those properties will see brightly illuminated surfaces and atmospheric scattered light and reflected light from clouds. Those illuminated surfaces will be juxtaposed with a very dark background of unlit areas and pinpoint lights across lake Washington. The contrast will be extreme and will prevent observation of those darker areas. This visual perception phenomenon must be considered in the EIS.

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### Impact of Traffic:

8.) According to the DEIS, the development of 15 sports fields (11 with lighting) will cause a **“major expansion of capacity and use levels.”** Traffic will increase by 2260 more cars per day on nearby arterials. Despite this expansion, DEIS claims “project-related increases in traffic volumes would be less than 3 % at most intersections affected, and no more than 7 %.” **How can you have major expansion and minor congestion? Both NE 65<sup>th</sup> and NE 70<sup>th</sup> are residential streets that run directly through our neighborhood. The View Ridge Community Council discusses current neighborhood traffic problems at every meeting. The DEIS does not adequately address the current traffic problems let alone the even greater traffic delays which will occur with the new sports fields.**

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TRAN1

### Impact of Noise:

9.) Sports field use will expand from “3,700 hours to 20,000 hours” (section 3.3.2.3, page 321) with the proposed plan. The DEIS concludes that “additional users and extended hours of use of [the] sports field complex would result in more frequent park use noise that might be carried beyond the project site...and would not likely be significant in off-site residential areas.” **Everyone who lives in View Ridge knows that the residential hillside acts as an amphitheater. The DEIS only made noise measurements at Sand Point Way and failed to make any readings from the**

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NOI1

neighboring hillside. All noise is amplified up the hill, traveling well beyond the park into the residential areas. How are we supposed to sleep when athletic games are played on 11 lit fields until 11:00pm every night?

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10.) "During the sports season in 2001 ...Athletic activities on the fields generated the same types of noise that would be expected with the proposal." (section 3.6.2.2 Operation, page 3-57) According to the parks department sports fields scheduling office, we currently have two softball fields and two soccer fields. **The proposed plan is for 15 sports fields-- more than triple the current number or a 275% increase.** It is well known that the current level of activity is audible throughout the View Ridge neighborhood. In fact, residents have complained about noise emanating from the park during the day and night. The noise intensity will significantly increase with 15 sports fields. The proposed plan will also bring expanded nighttime activities with 11 lit fields. Nighttime noise has its own unique problems. **The DEIS fails to consider the absence of masking noise during the night. They fail to address the fact that noise perception differs from day to night.**

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11.) The DEIS proposal limits construction activities to daylight hours for compliance with the City's Noise Ordinance. **Why doesn't the Ordinance limit noise generated from the use of 15 sports fields to daylight hours?**

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NOI2

12.) The DEIS estimates that "Construction activities associated with the proposed action would result in unavoidable noise impact intermittently over a lengthy construction period (at least 10 years) within the neighboring community." **10 years of noise from unnecessary major construction is an unfair burden on the community!**

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NOI3

#### Impact on City Funding:

13.) The DEIS states that "To date, the city has committed 12 million in funding." "However, it is not likely that the project can be fully financed only through public funding; a combination of both public and private funds will be required." **Why is our city spending 12 million dollars and asking for countless donations to ruin a beautiful natural park area when we can't even afford to repair our city streets and highways or build a mass transit system?**

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#### Impact of Lighting on Wildlife

The DEIS admits to the negative impact night lighting will have on wildlife.

#### Effects on migratory birds:

14.) The DEIS includes statements about the significant negative impact of the sports field lighting on wildlife.

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"Studies have shown many species of birds are impacted by artificial lights." "Birds that migrate nocturnally can also be strongly attracted to lights... and once inside a beam of light, become trapped because they are reluctant to fly out into the dark. The most

susceptible species include those that fly relatively low, such as warblers, thrushes, vireos, and other songbirds, raptors, and shorebirds."

An article entitled the "Dark Side of Light" from the 2000 March-April issue of Audubon Magazine expounds on the negative impact of night lighting. "Hundreds of species of migrating birds that fly after the sun sets, including most songbirds and many shorebirds ...normally ... rely on constellations to guide them during their twice-yearly migrations. But scientists speculate that...bright lights short-circuit their steering sense." "When birds suddenly reach the light's source, they often seem to become confused or blinded by the glare, which can be disastrous." "Birds may slam into windows, walls, floodlights, or even the ground."

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While the impact on migratory birds is mentioned in the DEIS, **no adequate solution is proposed for mitigating the effects of reflected light from the 11 sports fields. The glare from the two large baseball fields will be particularly bright and not fully shielded.**

#### **Effects on feeding and breeding behavior in animals.**

15.) The DEIS includes statements about the significant negative impact of the sports field lighting on feeding and breeding behavior.

"Many species of birds have been observed using artificial light to extend their feeding period into the night...Extended feeding patterns may cause disruption to the biological day-night cycles of birds and greater feeding pressure on prey species."

The glare from the two large baseball fields and nearby soccer and rugby fields will reach into the wetland. The lights will be on every night from 2.5-7 hours, depending on the season. That is a significant increase in daylength, particularly from fall migration through early spring, the time of breeding behavior.

We know that daylength affects breeding behavior in animals. Dr. John Wingfield, Chair of the Zoology Dept. at the University of Washington, states that "artificial lighting can result in premature breeding as the change in light levels in spring is the signal that triggers preparation for migration and breeding."

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Audubon Magazine (Mar/Apr 2000), "The Dark Side of Light," looks at the effects of artificial light on birds: "Overexposure to light may explain reports from English researchers about robins singing at night if there are streetlights in their territories, or why some birds build nests during the fall, instead of spring. Their internal clocks have gone haywire."

While the negative impact on wildlife is mentioned in the DEIS, **no adequate solution is proposed for mitigating the effects of field lighting on wildlife.**

16.) "...Lawmakers in hundreds of communities have passed ordinances that restrict lighting types, power, and use...[In the spring of 1999] Texas and New Mexico became the fourth and fifth states (along with Arizona, Connecticut, and Maine) to implement a statewide light-restriction program. The ordinances vary in scope, from banning certain

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types of streetlights or limiting their wattage to shielding security lights. Similar actions are being considered in other states.”(Audubon Magazine (Mar/Apr 2000). Even Redmond, WA and Shoreline, WA have adopted more stringent lighting restrictions than Seattle has. **Why is the Seattle Parks Department contributing to light pollution when hundreds of communities nationwide have implemented light restriction ordinances?**

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17.) The sports fields project will result in the what the DEIS characterizes as the “displacement of up to 10 acres of existing habitat, predominantly wet meadow and scrub wetland, with synthetic-turf sports fields, landscaped areas, parking lots and trails.” The DEIS states that along with “reduced numbers likely for ground- dwelling birds,” there are “reduced numbers expected for ground-dwelling mammals such as meadow voles, shrews, mice, rats and rabbits.” **Will rodents chased out of their neighborhood end up in ours?**

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WDLF2

### Conclusion and Recommendations

The Draft Environmental Impact Statement for this proposed action is deficient in several respects as indicated above. We strongly urge the Seattle Department of Parks and Recreation to develop a supplemental DEIS to respond to the multitude of outstanding issues. Failure to adequately assess the impacts of the proposed action and mitigating factors risks an inadequate and legally vulnerable final environmental impact statement. We look forward to receiving your supplemental DEIS.

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Citizens for Wildlife and Neighborhoods



## Friends of Athletic Fields

### Position statement on Draft Environmental Impact Statement for Sand Point/Magnuson Park

February 4, 2002

Friends of Athletic Fields (FAF) is pleased to endorse the Proposed Action for the drainage, wetland/habitat complex and sports field/courts project at Sand Point/Magnuson Park. We have a deep appreciation for the care, expertise, sensitivity, and effort that went into the preparation of the Draft Environmental Impact Statement (DEIS) and would like to congratulate Park staff, consultants, and community members for completing what should be considered a model process.

Consistent with our role in representing playing field users from Seattle and the region, we would like to make specific comments on several key points about the proposed action for sports fields and courts.

- It is crucial that 11 playing fields be built with synthetic surfaces and lighting in addition to the multipurpose grass sports meadow. The lesser capacity alternative of seven lit fields has two serious flaws: 1) it does not adequately address current, much less future, demand for lit, year-round playing fields, and 2) it seriously under-serves winter sports such as soccer, ultimate frisbee, and rugby. To drive this point home, the lesser capacity alternative would not come close to meeting the current demand for practice fields from the youth soccer club in the neighborhood immediately adjoining the park—much less the demand from other user groups.
- We endorse the 11 p.m. shut-off time for lighted playing surfaces, consistent with current Parks and Recreation policy. The 11 p.m. shut-off time makes it possible for adult leagues to play two games each evening after youth play is complete. Currently, members of adult leagues who live in Seattle routinely drive to Everett, Black Diamond, Redmond, and other distant points to gain access to lit fields. The 11 p.m. shut-off will reduce travel distances for Seattle-based teams with commensurate reductions in traffic congestion and resource use throughout the region.

In addition, FAF recommends that the DEIS be revised to reflect the following goals:

- 1) The five lit, synthetic baseball fields should be lit to a Class III level, consistent with Department of Parks and Recreation policy. This slightly higher lighting level will increase safety of play and make field standards consistent across the city's field inventory.
- 2) The multipurpose rectangular fields (numbers 12 and 13) should be lit from the perimeter to encourage multiple use. Because the current design calls for two light poles to be placed between the fields, these fields cannot be used for rugby and they

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are a tight squeeze for ultimate frisbee. This request is consistent with city council and park department directives to design facilities for multiple use wherever possible.

- 3) Explore the possibility of using 1500W lamps on steel poles to reduce the total number of lamps and poles required to light the fields.
- 4) Explore the possibility of using adjustable lighting systems that could be turned brighter or dimmer, depending on the sport being played.

In closing, we would like to restate our appreciation for the quality of this DEIS and our enthusiasm for this project. The combined habitat area and playing fields/courts complex promises to become a crown jewel of the city's park system and an important regional asset for recreation and education. We look forward to working as partners with the city council, the Department of Parks and Recreation, and other community groups in raising the funds required to make the vision embodied in the DEIS a reality.

Thank you for your time and attention,

The Friends of Athletic Fields Board

Peter Lukevich, President  
Geoff Clayton  
Bill Farmer  
Scott Freeman  
Mike Merriam  
Anita Parker  
Alvin Rutledge  
Adam Waltzer

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PD9  
CONT

## Eric Friedli - EIS Sand Point Sports Fields

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**From:** "J. Howard Finck" <Howard@friendsofyouth.org>  
**To:** "eric.friedli@ci.seattle.wa.us" <eric.friedli@ci.seattle.wa.us>  
**Date:** 1/31/2002 10:40 AM  
**Subject:** EIS Sand Point Sports Fields  
**CC:** Sheri Boelter <Sheri@friendsofyouth.org>, Bob Rench <Bob@friendsofyouth.org>, "yyouthcare@aol.com" <yyouthcare@aol.com>, "tandslee@aol.com" <tandslee@aol.com>

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Eric, I have received and read the draft EIS for the Sand Point Sports complex.

It has raised several concerns. The intensity of uses and the lighting of the identified area under the first option will be damaging to the emotional and physical health of our residents (I was surprised, by the way, to see how minimally the effects on the Sand Point Community Housing Association programs was covered in the draft--it was almost like they didn't exist or matter).

Residents of our Harmony House are young mothers with very traumatic histories. They are working incredibly hard to bring some stability and hope to their lives and those of their children. The light and glare of the complex, as proposed, will clearly affect sleeping patterns, especially with the infants. Keeping the lights on until 11:00 at night, with traffic/exiting lights on later than that, will cause significant and profoundly adverse impacts for this this very vulnerable population.

Friends of Youth is unalterably opposed to the proposed action. Our clients will address the potential impacts they fear during the hearing on February 1.


Howard Finck, President  
Friends of Youth

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**Eric Friedli - DEIS - sportsfield project**

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 **From:** Jennifer Lucas <Jennifer@friendsofyouth.org>  
**To:** "eric.friedli@ci.seattle.wa.us" <eric.friedli@ci.seattle.wa.us>  
**Date:** 2/28/2002 12:22 PM  
**Subject:** DEIS - sportsfield project

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To whom it may concern:

On behalf of Friends of Youth, Harmony House, we strongly oppose the Sports Field Project as proposed. Harmony House, a transitional living program that serves homeless young moms between the ages of 18-21, is located on the Sandpoint Naval base. In brief, please consider the following:


1) More consideration needs to be given to the impact that this development will have on residents living on campus.

2) Light and noise generated from this project will significantly impact residents. For example, one of our babies has a seizure condition. Bright artificial lights can trigger seizures.

Please give serious thought to the consequences this will have on people who consider this space their home, not a recreational opportunity.

Sincerely,

Jennifer Lucas, MSW  
Case Manager  
Friends of Youth  
Harmony House



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## **HAWTHORNE HILLS COMMUNITY COUNCIL**

Established 1945; Serving over 1100 homes in Northeast Seattle  
 6057 Ann Arbor Ave NE  
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February 27, 2002

Eric Friedli, Director  
 Planning and Operations  
 Sand Point Magnuson Park  
 Seattle Department of Parks and Recreation  
 7400 Sand Point Way NE  
 Seattle, WA 98115

Dear Mr. Friedli,

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the Drainage, Wetland/Habitat Complex and Sports Field/Courts Project at Sand Point Magnuson Park

Hawthorne Hill has long watched the property and has been involved in varying degrees during its transformation from the US Naval Air Station to the largest park in the Northeast area of Seattle. The beginning of this process began in 1972 when the Warren G. Magnuson Park was dedicated.

Our community is well aware of the controversy that has developed concerning the proposed sports complex with synthetic turf and lighted fields. We are strong supporters of parks in Seattle and we vote to support those parks. We want more fields for our children to play team sports. We rely on the Seattle Department of Parks and Recreation to provide the necessary data to us to assure us that the Seattle residents do indeed need more fields and that we do not have enough fields, fully developed and maintained. We understand that some fields may be lighted because the Seattle youth and young adults need to play when it is too dark. We do support the efforts of the Seattle Residents for Fair Field Lighting and their recommendations for lighting standards at Sand Point/Magnuson Park. The highest standards for lighting and for lighting designation in the city must be adopted before action on the Environmental Impact Statement can be taken. We would expect that the parking lots that are lighted and the fields that are lighted would use the most modern technology to promote the least amount of glare and sky glow as well as the least amount of light spill into the natural area of the park.

We would also like the DEIS to address the cumulative impacts of all of the other development within Sand Point/Magnuson Park and in the area. This review should be undertaken to ensure appropriate mitigation.

Sincerely,



Bonnie E. Miller, President  
 Hawthorne Hills Community Council

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SEPA5

February 27, 2002

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Eric Friedli  
Planning and Operations Manager  
Sand Point Magnuson Park  
Department of Parks and Recreation  
7400 Sand Point Way NE  
Seattle, WA 98115

CC: Seattle City Council  
Superintendent Kenneth Bounds  
Seattle Parks Board

Re: Comments on the Sand Point Magnuson Park DEIS for Drainage, Wetland/ Habitat complex and Sports Fields/ Courts Project

Dear Mr. Friedli:

Thank you for the opportunity to comment on the Draft EIS for the Wetland/Ballfield development at Magnuson Park. I am writing to deliver the official comments on behalf of MESA, Magnuson Environmental Stewardship Alliance. We are a group of neighbors, members of the Seattle Audubon Society and the Washington Native Plants Society. We have worked hard in the park for approximately six years on habitat restoration, focusing on a 15 acre site at the south end of the park, Promontory Point. We have several work parties a month and have mobilized hundreds of volunteers to plant thousands of native plants and pull out hundreds of cubic yards of invasive plants. We plan to continue our work and advocacy for open space as the wetlands are developed.

We favor alternative one with modifications. Our main goal is to have a functioning, diverse, wetlands habitat and think the design by Dyanne Sheldon addresses many of the elements needed. We like the increased shoreline and the shelter for young fish. We like the effemeral ponds because they will keep healthy the best Pacific Chorus Frog population in a city park. We like the year round ponds that can in the future support native salamanders and turtles. We appreciate that some of the area will not be scrapped during construction so we will not be starting totally from scratch again. We do however have concerns with the wetlands presented in the Draft EIS.

No where is the impact of the enormous amount of lighting planned for the adjacent ball fields addressed. We understand it to be 2/3 the lighting in SAFECO field with no roof or walls. 20% of the lit fields in the city would be at Magnuson Park, adjacent to these wetlands. Research shows migratory song and shorebirds are particularly effected by lights. Night lighting impacts nesting success, may increase predation, increases mortality, and changes the population dynamics of birds and other wildlife in the area. We are concerned our frogs will be adversely impacted their foraging and reproduction with four plus more hours of daylight than is normal during winter and early spring. The DEIS does not address how this increased lighting will impact plants. Therefore we are opposed to lighting of the fields.

We feel that the cross country track is too wide and cuts across the wetlands in such a way as to create a dike for water flow and a barrier to animal movement. Eight feet would be adequate for both joggers and emergency vehicles, twelve feet is excessive. The planned ADA accessible trail down on the north side of NE 65<sup>th</sup> St. behind the old officers quarters is unnecessary and will destroy habitat in an area deemed a "potential jurisdictional wetland," in the 1996 Navy EIS. This path should be left as it is for walking access only.

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The Vegetation Management Plan for the park should be part of the EIS statement. We are concerned that no where does the draft speak to plants to be planted in the wetlands. We advocate use of native plants only in the part of the park to be developed. This would have great educational value and serve to unify the park. We are concerned that tall trees, as well, need to be part of the plan for raptors to perch on, for noise and light buffers between the ball fields and wetlands, and for the general beauty and diversity of the site.

The DEIS for Magnuson Park and the wetlands calls for an Education Shelter, with a classroom adjacent to the wetlands. We think this is a wonderful opportunity for environmental education classes to take place on site and should be given high priority.

Phasing in the plan includes using crushed asphalt in the first phase to build up the sports fields in phase one. We are opposed to this. Natural materials should be used from the wetlands for this fill. We do not know the environmental impacts of using this material. We know the soils are good in the wetlands and the idea was to use cut from the wetlands to fill for the ballfields, not off site or on-site recycled cement or asphalt material to fill the wetlands or ballfields.

We favor artificial turf over natural turf because of the low need for pesticides and fertilizers near the wetlands. The affects of this should be monitored, however, no plan for monitoring appears in the DEIS. Contaminated drainage from the Off Leash Dog area also needs to be monitored. Problems with e-Coli and Giardia can spread to mammals in the wetlands environment from the OLA. With artificial turf games can be played all year, not just half the year. We thought because of this perhaps there would be fewer fields and more room in the plan to corridors of trees and plantings around the developed fields. Instead of a unified park with corridors, we now have building, fields, wetlands in strips with little flow between.

We do not feel alternative two shows enough of a change from alternative one. We would like to see the number of fields reduced to provide for a more park like design. We have been told that the state SEPA requires that an off-site alternative be addressed. Ball fields do not need a view of Mt. Rainier and Lake Washington. When Mr. Carkeet gave much of this land to the city in 1918 for a park, he invisioned a quiet resting spot, away from the "hustle and bustle" of city life. As the city has grown so has our need for this space to view the wildlife, mountains, and water of our beloved NW.

Thank you for the opportunity to comment on the final design for this city treasure.

**Lynn Ferguson, Chair**  
MESA  
6422 N.E. 60<sup>th</sup> St.  
Seattle, WA 98115  
(206) 523-0391  
Lynnferg@aol.com

# Northeast District Council

4534 University Way NE  
Seattle, WA 98105  
(206) 233-3732

## Members

*Belvedere Terrace  
Community Council*

*Greater University  
Chamber of Commerce*

*Hawthorne Hills  
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*Inverness Community  
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*Inverness Park  
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Council*

*Wedgwood Community  
Council*

*Windermere  
Corporation*

*Windermere North  
Community Association*

January 15, 2002

Mr. Eric A. Friedli, Director, Operations and Planning  
Sand Point Magnuson Park  
7400 Sand Point Way NE  
Seattle, WA 98115-6302

Re: Proposed Sports Field Lighting at Sand Point Magnuson Park

Dear Eric:

The Northeast District Council (NEDC) has reviewed the Sand Point Magnuson Park (SPMP) Draft Environmental Impact Statement (DEIS) for the Drainage, Wetland/Habitat Complex and Sports Fields/Courts Project. Due to the significant adverse impact on the SPMP wetlands and natural areas as well as the several communities, which are in direct view of the proposed lighting, the NEDC requests that there be no sports field lighting at SPMP.

In deference to the statements contained in the DEIS, the proposed lighting will have major detrimental effects on the nesting and nocturnal foraging behavior of wildlife and will confuse birds during migration, particularly during cloudy weather which exacerbates the negative effects of lighting. Furthermore, and of equal importance, the lighting will cause significant glare and reflected sky glow for the neighboring communities.

The recent lighting demonstrations illustrated how even a small number of lights adversely impacts the neighbors of the park. Moreover, the adjacent neighborhoods, through which arterial streets pass, will be adversely impacted by traffic and noise from the greatly increased number of sports-related visitors to the park during the evening and night hours.

Great effort has been made to make SPMP serve a variety of uses while emphasizing the park's natural areas and wetlands. The region's sports field capacity will already be greatly increased by the addition of eleven fields at SPMP. The natural areas should not now be further compromised by the addition of sports lighting. If the SPMP proposal is developed, this park will have 19 percent of the illuminated fields in the city plus the additional lighting required for parking. This is an environmental burden, which is beyond the capacity of the natural areas and the surrounding neighborhoods to assimilate.

We trust that our position and concerns will be fully and fairly recognized in the FEIS and that any action taken will be for the absolute minimum adverse environmental effect.

Sincerely,

*JIM SIMPKINS*

Jim Simpkins, Co-Chair  
2823 Broadway East  
Seattle, Washington 98102  
206-860-0076 / fax 324-9339  
[jimsi@exmsft.com](mailto:jimsi@exmsft.com)

*Jeannie Hale*

Jeannie Hale, Co-Chair  
3424 W Laurelhurst Dr NE  
Seattle, Washington 98105  
206-525-5135 / fax 525-9631  
[jeannieh@serv.net](mailto:jeannieh@serv.net)

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SEPA3



**Eric Friedli - In support of Sandpoint**

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**From:** CF <neslltreas@yahoo.com>  
**To:** <eric.friedli@ci.seattle.wa.us>  
**Date:** 2/27/2002 11:24 PM  
**Subject:** In support of Sandpoint

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## Statement for the draft EIS:

The Northeast Seattle Little League supports the complete and full implementation of the development of the Sandpoint - Magnuson Park complex. This includes the incorporation of lighting and all-weather turf for 11 fields.

The addition of lighting and all-weather turf will increase the availability of these fields. This will benefit our League by providing more field time and allowing the expansion of our baseball and girls softball programs. Our programs are severely restricted by the lack of fields.

One of the major issues in our league is a lack of practice times and fields for teams. Our league has 60 teams at various levels. Teams are limited in the number of pre-season practices due to the lack of fields. This is compounded when muddy fields and early darkness prevents the use of the fields. Once the season starts, no fields are allocated for practices as all fields are dedicated for games. Lights and turf will help us resolve this situation.

All the grass and dirt fields that NESLL currently uses are unplayable after it rains. This is a chronic problem with fields at Sandpoint - Magnuson which turn into muddy messes due to the poor drainage. Also, geese frequent these fields and cover the entire area with goose waste. This is a highly unsanitary condition. When dry, the fields are filled with rocks and uneven, which is a very unsafe condition. Unfortunately NESLL is forced to use these fields because we have no other choice.

The current conflicts we have over the fields from other baseball and softball programs through Seattle Parks, high schools and adult leagues can be mitigated with this development. These lighted and turfed fields will be available for longer periods and be in a playable condition.

The goals of NESLL are to improve our players physically, psychologically, socially and morally. The sports skills that they learn will help with their physical development, having fun will help them psychologically, the teamwork they experience helps their social development and learning sportsmanship will help them morally. Complete implementation of the Sandpoint - Magnuson development will us reach these goals.

Northeast Seattle Little League  
Stuart Kahn, President  
Mike Pierson, Vice President  
Curtis Fukushima, Treasurer  
Joni Noges, Secretary  
Rob Foxcurran, Player Agent  
Rick Badura, Player Agent  
Mike Kimmey, Safety Officer  
John Hartley, Jr./Sr. League Coordinator  
Ed Minshull, Softball League Coordinator  
George Carlin, Majors League Coordinator  
Jay Hare, Minors League Coordinator  
Hank Franklin, Minors League Coordinator  
Dan Larson, Farm/Tee Ball League Coordinator  
Larry Smith, Newsletter Editor  
Bob Brittain, Information Officer

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MEMORANDUM OF RESPONSE: 02/25/02 (#2)

TO ERIC FRIEDLI  
PLANNING AND OPERATIONS DIRECTOR  
SAND POINT MAGNUSON PARK  
[eric.friedli@ci.seattle.wa.us](mailto:eric.friedli@ci.seattle.wa.us)

RE: DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS)  
SAND POINT MAGNUSON PARK (SPMP); DRAINAGE,  
WETLANDS/HABITAT, COMPLEX AND SPORTS FIELDS/COURTS  
PROJECT  
**"Potential Negative Impacts"**

FROM: McDonald W. SULLIVAN  
REPRESENTATIVE, PARKPOINT CONDOMINIUM ASSOATION (PCA) AND  
PARK VOLUNTEER

**GENERAL STATEMENT OF SUPPORT**

I write the memorandum for the record as the appointed representative of Parkpoint Condominium Association and as an active volunteer in many of the activities and items at issue currently under review and addressed in the EIS that is the subject of this memorandum. Parkpoint is a direct Park neighborhood. It is complex of 130 townhouse Condominiums on approximately 10 acres of land at Sand Point Way and 65<sup>th</sup> Street NE, directly across from the of the South West corner of SPMP at its SW entry.

For the most part I am highly supportive of the plan. I fully support the drainage, wetland and Habitat conclusions described in the EIS as well as the building of the athletic field, the use of artificial turf. These elements of the plan are very exciting and I commend the Staff of SPMP for the hard work and dedication to principles demonstrated in carrying out these aspects of the study culminating in Draft EIS. I would also like to commend the leadership of the Department of Parks for their wisdom in establishing SPMP as a independent division of the Department of Seattle Parks and extensive effort that they have gone through to involve the neighborhood in the planning and implementation process. I have never found the doors of the members of the SPMP staff closed to my efforts to communicate my ideas or concerns.

I also support and believe that SPMP as an asset of the people of Seattle, for their public use, requires that the Park must be considered a 'Regional Facility', as required by law regarding its use and its rights of access. At the same time SPMP functions as our local and community Park and has the impact (both positive and negative) that local parks can and do have on their

neighborhoods. As an active volunteer I seek to strengthen the community side of the Parks role in its dual role as both a 'neighborhood & regional facility' and lessen those impacts that a regional facility will entail by its nature.

In this regard this memorandum discusses the potential **negative impacts** of the dual 'Park's Regional Roles' as related to the 'Park's Neighborhood Roles' and the conflicts inherent in Park Operation serving dual interest. This memorandum deals with the issue most critical to the immediate neighborhood, impacts relating to lighted nighttime activities at the Park (generally after 9PM), and specifically, the effects caused by lighted fields and their related activities. The 9 to 11 time period, which will be further amplified on, is not a "fixed period" because natural light variations vary greatly. In this memorandum, this two-hour time period is identified to demonstrate issues and concerns, not to rigidly block out on a year-round basis, lighted activities between 9 and 11PM.

Below are summarized 4 specific areas of concern:

- 1) The major issue confronting PCA are the public safety affects caused by extended hours of activities and their affects on traffic both by automobiles and pedestrians after 9PM. Parkpoint is a community consisting mostly of elderly individuals in their 70's and 80's. Widows living alone occupy a number of townhouses. Many have become residents of Parkpoint because our facility has been able to provide them with a level of security they feel comfortable with. After hour activities (9 to 11 PM) will present increased potential of public safety issues that could effect their property and persons.
- 2) A major consequence of field activities (9 to 11PM) on the neighborhood as a whole, also has large potential affects on property values on View Ridge. The EIS does not deal with the 'real facts' of the situation facing the Neighborhood nor the implications or impacts of loss of tax revenues to the County and City Treasury.
- 3) The organizational structure needed to find the proper balance on the issue of "late lights" is not addressed in the Draft EIS; in fact the need to find a balance is not considered because the Draft EIS states incorrectly that the affects are negligible.
- 4) The issue of 'nights lights' specifically in the 9 to 11PM period has the potential of creating hostility between the neighborhood and the Park. More then any other issues, 'lights' burn as the principle

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item of concern, and for good reason. The cost of creating an impact that will remind people of their hostility, and that is resented as being forced on surrounding homes, is not worth the value of extending playing time under the lights. The comparative value or worth in good feeling, cooperation, volunteer participation, plus lost public tax revenues, is heavily weighted toward the neighborhood, not in 2 hours of playing time under lights. Today the relationship between the Park and the Neighborhood can be generally described as positive. The importance of maintaining a positive neighborhood is encouraged in the Parks management plan. The value of the work of its administration to date is far greater to Parks than the value of extending 'lighted playing time' for regional interest. Parks is encouraged to work with an almost united neighborhood front that seeks compromise of a 9PM cut off time.

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CONT

In elaborating the four prints above some are self-explanatory, (point 4) and others require additional explanation.

Concerning the issue of public safety. It is accepted in State Crime statistics that the majority of crime is caused by young men of the ages that will use the fields at night. Additionally, public safety problems increase the later after dark activities end. If the time period of "lighted sports activities" was extended beyond 9PM additional police response would be required in emergency situations, either regarding Public Safety or in other disturbances requiring police response.

PCA believes that reasonable time to request that our residential neighborhood returns to its "quiet state" is 9PM. As a self-governing association, Parkpoint in its "Standards of Conduct" abides by a 9PM standard quiet time, when residents are asked to conduct their affairs in such a manner that others will not be disturbed. As stated above this is especially true of Parkpoint, but it also applies to many of the condominiums that line Sand Point Way, part of the 1700 residential units that make up our larger community. Issues of Public Safety would have a negative impact on the value of Condominiums Units. If owners and potential buyers do not feel safe or are confronted by statistics of increased problems to their persons and property, an essential element of the perceived value of living at Parkpoint will be lost and values will diminish (or be affected negatively). The approximate gross tax revenues for Parkpoint are \$400,000 per year. Negative impacts created by continuous late night athletic events in the Park and related activities could affect values by 5% to 10%. Over time the diminished tax revenues (even with inflation) could represent annual losses in revenues of between \$20,000 and \$40,000 per year.

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PSU1

The potential 'lost value effect' on Parkpoint is small compared to the homes on View Ridge. The values of houses on View Ridge are increased substantially because of the views they provide the owners. Depending on the properties' view the estimate of increase value can range from 10% to 30%. The relationship between View Ridge values and Sand Point Magnuson Park is special. The Draft EIS demonstrated this by including photo pages, identifying significant viewpoints, and including general comments. However, the Draft EIS fell short of describing the 'sense of connection, the poetry of the site, the joy one gains when driving West to East at the top of the Ridge, the panorama of Mountains, lake and expanse of the Park all laid out before them.

In its description of supporting recreation sports over competitive sports, the reduced number of spectators was cited as an important consideration. That fact that the homes on View Ridge overlooking lighted sports fields can not avoid viewing activities (i.e. being spectators) was never considered. In this regard Sand Point's lighting issue is unlike any other setting and comparisons do not apply. The EIS description of minor impacts is flawed in not suggesting that different hours of the day or night have significant effects, and that season changes or daylight savings will effect the relationship between View Ridge and the Park. The vast majority of our Community does not accept this conclusion. We know it is incorrect. We are seeking valid solution to an important problem that has been inadequately addressed.

This writer accepts the fact that Sand Point will have lighted sports fields. As an ex-athlete I am in support of the sports fields and generally in favor of the sports programs described in the Draft EIS that emphasizes recreational sports, not competitive sports. The difference in of recreational sports vs. competitive sports if managed sensitively can be very great. I feel our children need good fields and I support them.

The Principles of the fields are positive. The potential management of how the fields will be used, the hours, and the affects of extending hours beyond the 9PM cut-off period will produce negative impacts far beyond any value the Park and community gain in extending hours. I believe that the Community will accept 9PM even though it will have some negative impact and will cost the County and City millions in lost revenue over the next decade.

Arriving at Working Base Numbers; Good views add value but the reverse is also true, 'negative views and impacts' diminish value. If View Ridge overlooked a steel mill or industrial area rather the Park and Lake Washington, the same house could command a 10% to 30% negative factor in market value to a base market price without views. The same physical property within the property lines could vary 20% to 60%. Overlooking a steel mill a home identical to a \$500,000 View Ridge property might command only \$200,000 or less. Extending' lights-on'

15 minutes beyond a "reasonable hour" increases the negative effect on View Ridge property. Lights past a 'reasonable hour' as seen from View Ridge homes on a continuous basis will effect the value most of the homes with the best view.

I have been advised in discussions with real estate professionals that conservatively the number of houses on the Ridge overlooking Sand Point Magnuson Park is in excess of 650. Furthermore I have been given an average value that easily exceeds \$500,000. Taking what I believe to be conservative numbers the 'view factor' of View Ridge has a potential value as follows:

View Value of View Ridge Home =  $650 * \$500,000$ , multiplied by 0.20 or \$65,000,000. The County tax Levy Rate in the City of Seattle for 2002 is 10.66176. Estimated Gross Tax on the Value attributed to views for 650 homes is = \$ 693,000 per year.

This tabulation is only a 'raw' estimate of the gross value of the views. Many factors can push the numbers either way. A better base number could be established by spreadsheet analysis of the times of the year and how much lighting was used at different times of the day or night, each month requires a separate set of numbers. In addition the amount of value can vary with individual perception, how the home is used etc. and most important, the actions and directions of administration of the lighting in the Park.

The issue here is what is the percentage effect of the '\$693,000 in 'view value' on extending 'lights-on' in different time periods, and what are their equivalent negative affects. The affects on Tax Revenues of certain percentages of the total "view value" are listed below:

1-%	\$6,930 annual revenue loss tax	\$69,300 /10 year lost
3%	\$20,790	\$207.900
5%	\$34,650	\$346,500
10%	\$69.300	\$693.000
15%	\$103,950	\$1,039.500

Having made the assumption that field lights are part of the neighborhood – the question is what is the value to the Park of keeping 'lights-on' beyond time periods that the community believes will have serious adverse effect. Adverse effects will establish, to some extent, in having lights at all. The issue of 'what the neighborhood will tolerate',

pushing the levels will clearly negatively effect values in some way (i.e. lowering the values of sales with field lights vs. no lights)

If the Park and the community continue to maintain a positive working relationship, if field lights are managed in a manner that is considered 'reasonable', if the community feels they are participants, not just bystanders to the resolution of problems, the positive aspects of Sand Point Magnuson will outweigh negative and conflicting uses that the Parks regional uses will entail.



Ravenna Bryant Community Association  
6535 Ravenna Ave. NE  
Seattle, WA 98115

February 27, 2002

Eric Friedli  
Planning and Operations Director  
Sand Point Magnuson Park  
Department of Parks and Recreation  
7400 Sand Point Way NE  
Seattle, WA 98115

RE: Sand Point Magnuson Park  
Drainage, Wetland/Habitat Complex and Sports Field/Courts Project  
Draft Environmental Impact Statement

This memo responds to the Draft EIS for SPMP Drainage, Wetland/Habitat Complex and Sports Fields/Courts projects and addresses Ravenna-Bryant Community Association's (RBCA) concerns on the proposed project and its impacts on neighboring communities.

The redevelopment of Sand Point Magnuson Park (SPMP) into a multi-use facility for the City of Seattle is endorsed by the RBCA. However, the proposed action as it is described in the Draft document demonstrates that certain issues and actions described in the EIS will negatively impact the surrounding community. Specifically, the number of sports fields leading to the need for additional lighting and parking were a concern. The increase in use of the facility will impact the traffic flow on local streets and major arterials in the surrounding neighborhoods.

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New sports fields should be developed as stated in the lesser-capacity alternative to the proposed plan. This plan calls for fewer synthetic surface sports fields, but incorporates four new natural-grass fields that do not require night lighting, and will ease neighborhood concerns about lighting issues. The retention of the sports meadow allows for more recreational use. Additionally, this plan still calls for the redevelopment of the 65<sup>th</sup> street entrance to the park as the main entrance to the Park, with less emphasis on the 74<sup>th</sup> street entrance. Parking needs may still be met by the lesser-capacity alternative, but the traffic coming in and out of the Park during peak hours must be carefully studied.

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S/O3

In the past, ball field lighting has been addressed by several community groups. RBCA supports sensitive design of the lighting of play fields that allows users the light they need to play, but allows the community to enjoy the views of the lake and Park that may be adversely affected by the new City lighting standards. The

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use of new technologies that may shield the light and reduce glare must be used when possible.

The drainage and wetland plans in the proposed action and alternative provide ample opportunities for wildlife habitat in the complex. The newly built parking areas are another place where incorporating run-off reduction and small scale water-quality improvements may assist in the quality and quantity of water entering the constructed wetlands.

We hope our comments provided were useful. Thank you for including us in the review process.

Very truly yours,

Nazila Merati  
RBCA Board Member

Cc: Ken Bounds, DPR

**Eric Friedli - DEIS**

---

**From:** Greg Eckerman <gesand@wolfenet.com>  
**To:** "C. David Hughbanks" <cdavid.hughbanks@ci.seattle.wa.us>, 'Eric Friedli' <eric.friedli@ci.seattle.wa.us>  
**Date:** 2/6/2002 9:56 AM  
**Subject:** DEIS

---

Good morning C. David and Eric, attached for your review and consideration is my comments submitted at the public hearing on Monday. My comments are provided within the context of some understanding of the difficulty of your task and my sincere appreciation of your support to date for housing here at Sand Point. My Board will adopt a formal position at our February Board meeting on 2/20/02. I would appreciate an opportunity to meet with you to discuss the DEIS at your earliest convenience. Thanks, Greg.

## Sand Point Community Housing Association

Testimony Submitted by Greg Eckerman at the 2/4/02 Public Hearing  
In Response to the DEIS Released by the Seattle Parks Department

Good afternoon,

My name is Greg Eckerman. I work for Sand Point Community Housing Association and have been involved with developing the housing here at Sand Point. I started working onsite at Sand Point in January of 1997 back when there was just a few of us huddling around the electric heaters in the winter-time to keep warm. So I've witnessed all the changes that have taken place so far and am familiar with the competing interests and perspectives for how to develop the park. To date, I think the City, which means the mayor's office, the City Council and the Parks Department, has done a good job of balancing these different interests in an effort to develop the Park in a manner that can accommodate many uses for the benefit of the broader community. Creating a park where different interests and activities can coexist. However, in regards to the Sports Fields proposal, I think the interests of the sports people and perhaps the mission of the Parks Department and its staff, are being promoted at the expense of the surrounding neighbors, the people who live onsite and other user groups and interests.

Today, I speak on behalf of the Housing Association, its volunteer Board of Directors, the 158 adults, youth and children who live here right now and the thousands of homeless people who will live here in the future including those who will live on the building 6 site after the Association develops housing there. While I support the creation of more usable sports fields, I strongly oppose the Sports Fields Project as proposed because:

- Not enough consideration has been given to the impact that this development will have on park neighbors, especially people living on campus
- Because the light and noise generated by this project will significantly impact people living close by in an extremely adverse manner
- And because much more could be done to mitigate these adverse impacts.

The Draft EIS acknowledges that the sports fields lights will have a significant adverse impact on people living on campus and I quote:

"One unresolved issue associated with the proposed action concerns the potential for significant adverse impacts from sports field lights on the existing residential area between Sand Point Way NE and Sportsfield Drive within Sand Point Magnuson Park, and possibly on some units in the Radford Court apartment complex. These potential impacts appear to be unavoidable with the project as proposed, and evaluation to date has not identified mitigation measures that would necessarily limit these impacts to an insignificant level." (page 1-11)

"Primary exposure of non-park users to direct glare from sports field lights would be in residential area of Sand Point campus directly west of Sportsfield Drive, primarily Buildings 224, 6, 26N and 26S." (page 1-22)

In spite of this conclusion, the Parks Department is proposing to develop eleven (11) sports fields with 640 lights that will be lit until 11:00 at night, 365 days a year. Many of the lights on the baseball fields will be pointed west right at the homes of families that live close by. Plus there will be hundreds of more lights on the road, parking lot and pathways.

I don't know what the assumptions or thinking were that led to the Parks Department decision to propose this project knowing that it would really impact people living on campus. Perhaps the planners thought that since this was transitional housing and people would only live here for two years, that it would be ok or tolerable for them. Whatever the thinking, it was wrong headed and not reasonable. The people living closest to this project, who would be impacted the most, should be given every consideration, even more consideration than any other group or interest, regardless of whether they were homeless or living here for two years or whatever the rationale.

This proposed project is not acceptable. These lights will be extremely disruptive to the quality of life for people living here at Sand Point. There are adults and children of all ages living here including many school aged children. Many of the adults get up at the crack of dawn to get to work or school. The impact on their sleeping patterns, their ability to enjoy some peace and quiet, their loss of privacy, the constant intrusion of lights in their homes and on their every movement outside is not acceptable. An enjoyable place to live will turn into a nightmare.

The Draft EIS proposes mitigation measures, which include using special kinds of lights and minimizing the impact of lights on the road, parking areas and pathways. Yet the Draft EIS states the following:

"Some of the specific light and glare impacts under the proposed action or the lesser-capacity alternative would represent significant adverse unavoidable impacts. Direct exposure to glare from the sports field lights at some residences immediately adjacent to the project site appears to be a significant impact that would be unavoidable, even with the mitigation features incorporated into the project design." (p. 3-112)

The Draft EIS also identifies other possible mitigation measures that are not part of the Parks proposal. These include and I quote:

- "restricted hours of operation of the sports field lights, either for the complex as a whole or for the fields closest to the residential areas"
- and
- "shielding to block or screen glare evident at Buildings 224, 26N, 26S and 6, if feasible physical measures can be identified"

Not enough consideration has been given these possible mitigation measures and others not even listed. Surely with the technology and expertise available today, the Parks Department can do much more in this area. Why haven't suitable physical measures been identified? I'm requesting that the planners go back to the drawing table and find alternatives that reduce the impact of these lights to an acceptable level. If the Parks Department is unable or unwilling to mitigate these impacts, then I think there should be no lights for the sports fields.

Regarding noise, the Draft EIS states and I quote:

"Additional users and extended hours of use of sports field complex would result in more frequent park use noise that might be carried beyond the project site. Operational noise levels would not be high, would be abated somewhat by physical factors and existing noise, and would not likely be significant in off-site residential areas." (page 1-18)

I totally disagree with this finding. How can hundreds if not thousands of cars coming and going, whistles and bull horns blowing, loud speakers blaring and hundreds of players and fans

screaming and cheering not have a significant adverse impact on people living close by? The Draft EIS states and I quote:

“Major expansion of capacity and use levels for wide variety of structured and informal athletic activities at Sand Point Magnuson Park from development of 15 sports fields and sports courts of several types. Based on hours of use, project represents approximately six-fold expansion of capacity for sports field activities.” (p. 1-24)

Six times as much activity as compared to now. Yes, neighbors and people living on campus will be extremely and severely impacted by all of this noise. This will be terribly disruptive to the families and children on campus. Loud noise can be very intrusive when it goes on and on unabated. Kid’s bedtimes, dinner conversations, the right to peace and quiet enjoyment in one’s own home or yard, sleeping through the 11:00 PM hour (when hundreds of cars are fired up after the games) will be compromised.

The Draft EIS proposes no mitigation measures for this operational noise and states just one possible mitigation measure: “to prohibit or restrict the use of loudspeakers”. The Parks Department can and should do much more to address noise pollution. You don’t have to be an expert to know that fencing, berms or mounding of dirt and vegetation such as trees and shrubs are used all the time to absorb and mitigate noise. Again I ask that the planners go back to the drawing board and get serious about protecting the quality of life of neighbors.

Increased traffic on and around the campus is a serious concern to me. The safety of pedestrians, especially the children, will be put at risk by all these cars coming and going. It’s a problem right now with people zipping around the park. Yet, the Draft EIS does not even discuss the impact of increased traffic on Sportsfield Drive and cars traveling through the campus to get to the Sports Fields. Please give this overlooked issue more thinking and planning to protect the safety of all of us.

In closing I’d like to share my personal perspective on two issues. First, I’m not an expert on the EIS process or the regulations that govern these proceedings or the standards used to determine if an impact is significant. However as a person who lives one block away from a complex with two lighted soccer fields, I can tell you that the impacts I’ve described are real. Also that those planners did much more than is being proposed here to mitigate the impacts such as reconfiguring the project to reduce the number of lights, using elevated mounds of earth with fencing and large trees on top and reducing the hours of operation. My second point is that many people and groups have made compromises as the planning for the reuse of Sand Point has gone forward. Certainly no single group has made more compromises than the neighbors that live to the south of the park and west of Sand Point Way. I think the concerns of these neighbors are legitimate and in the spirit of fairness and finding a win-win solution, I’m requesting that the Parks Department modify its proposal to accommodate their perspective and to maintain the balance of interests that you have worked so hard to achieve. Thank you for the opportunity to respond to the Draft EIS.

3  
NO11  
CONT4  
NO145  
TRAN26  
L&G2  
SEPA3

# Sand Point

COMMUNITY HOUSING  
ASSOCIATION

Sand Point Community Housing Association provides housing and innovative services to assist families and individuals to successfully transition from homelessness into stable permanent housing.

February 28, 2002

## Board of Directors

### Officers

Jan Dickerman, President  
Anne Lester, Vice-President  
Florence Greff, Secretary  
Bob Lynch, CPA, Treasurer

Eric Friedi, Planning and Operations Director  
Sand Point Magnuson Park  
Department of Parks and Recreation  
7400 Sand Point Way NE  
Seattle, WA 98115

### Members

Walt Adam  
Stella Chao  
Joan Clough  
Christian Eberhardt  
Marlo Klein  
Barbara Nabors-Glass  
Rena O'Brien  
Katy Thomas

RE: Sand Point Magnuson Park Draft Environmental Impact Statement (DEIS)  
Drainage, Wetlands/Habitat Complex, Sports Fields/Courts Project

Dear Mr. Friedli:

### Director

Bob Rensch

The Board of Directors of Sand Point Community Housing Association (SPCHA) opposes, in the strongest terms possible, the Sports Fields component of the proposal. The SPCHA is the nonprofit community-based sponsor of low-income housing for homeless families and individuals at the Sand Point campus. Both the "Proposed Action Alternative" and the "Lesser Capacity Alternative" as stated in the DEIS will have an extreme adverse impact on the quality of life for residents living on the campus. Both Alternatives create unacceptable living environments for our residents and are incompatible with the residential zone already established by the City of Seattle's Sand Point Re-use Plan.

## Participating Agencies

AHA/Sacred Heart Shelter  
Community Psychiatric Clinic  
Fremont Public Association  
Friends of Youth  
Health Care for Homeless Veterans  
Hopelink  
Low Income Housing Institute  
The Salvation Army  
Seattle Conservation Corps  
YouthCare

In addition to our current stock of housing which serves 94 low-income households, SPCHA plans to develop 106 new units for homeless families with children on two sites right across the street from the proposed Sports Fields. Close to 600 adults, parents, youth and children will be living in very close proximity to the Sports Fields. We have attached a site plan showing the existing 94 units located in six buildings (330, 331, 332, 224, 26 north and 26 south), and the proposed location of the new units. The 106 new units are configured as low-density, ground related townhouses, with many of the units located directly across the street from the proposed new Sports Fields and parking lots.

While we in general support the creation of some more usable sports fields, we think that the adverse impacts of the lights, noise, air quality, construction and traffic on people living on-site has been largely ignored and inadequately documented in the DEIS. The scope of the project is way out of balance with the other planned uses, especially our housing located in the residential zone, as well as the wetlands and wildlife restoration project.

1  
SEPA7

2  
SEPA4

**We request that fewer fields be developed with no lights. We also request that the public parking lots be located further away from the housing, and that a buffer zone be established between the Sports Fields and the existing and proposed new housing in the residential zone.**

The buffer should serve as a visual and sound barrier as well as a physical barrier. We wish to have sufficient distance separating our housing from the noise, traffic, parking and visual blight of the Sports Fields. We request that the design incorporate attractive landscaping, a greenbelt, fencing, and pedestrian access and safety features for our residents, many who are school age children. The SPCHA is willing to work with the Parks Department's design team to explore design options to mitigate our concerns.

Our concerns and requests are based on the following information taken directly from the DEIS.

The DEIS acknowledges that the sports fields lights will have a significant adverse impact on people living on campus as stated on page 1-11 of the DEIS. Therefore we are opposing the use of lights for the sports fields. We believe daytime and daylight uses of the fields to be adequate, as is the current scenario.

"One unresolved issue associated with the proposed action concerns the potential for significant adverse impacts from sports field lights on the existing residential area between Sand Point Way NE and Sportsfield Drive within Sand Point Magnuson Park, and possibly on some units in the Radford Court apartment complex. These potential impacts appear to be unavoidable with the project as proposed, and evaluation to date has not identified mitigation measures that would necessarily limit these impacts to an insignificant level."

In spite of this conclusion, the Parks Department is proposing to develop eleven (11) sports fields with 640 lights that will be lit until 11:00 at night, 365 days a year. We also understand the parking lot lights will stay on well past 11:00 PM. Many of the lights on the baseball fields will be pointed west right at the homes of families that live close by. Plus there will be hundreds of more lights on the road, parking lots and pathways. The people living closest to this project, who would be impacted the most, should be given every consideration, even more consideration than any other group or interest. We raise the concern that our residents might have been ignored in the DEIS because they live in transitional housing programs designed for low-income, previously homeless people.

This proposed project is not reasonable. These lights will be extremely disruptive to the quality of life for people living here at Sand Point. There are adults and children of all ages living here including many school aged children. Many of the adults get up at the crack of dawn to get to work or school. The impact on their sleeping patterns, their ability to enjoy some peace and quiet, their loss of privacy, the constant intrusion of lights in their homes and on their every movement outside is **not** acceptable. An enjoyable place to live will turn into a nightmare.

Regarding noise, the DEIS states on page 1-18:

"Additional users and extended hours of use of sports field complex would result in more frequent park use noise that might be carried beyond the project site. Operational noise levels would not be high, would be abated somewhat by physical factors and existing noise, and would not likely be significant in off-site residential areas."

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SEPA3  
SEPA84  
L&G25  
NOI1



We totally disagree with this finding. How can hundreds if not thousands of cars coming and going, whistles and bull horns blowing, loud speakers blaring and hundreds of players and fans screaming and cheering not have a significant adverse impact on people living close by? The DEIS states on page 1-23:

“Major expansion of capacity and use levels for wide variety of structured and informal athletic activities at Sand Point Magnuson Park from development of 15 sports fields and sports courts of several types. Based on hours of use, project represents approximately six-fold expansion of capacity for sports field activities.”

5  
NOI1  
CONT

Six times as much activity as compared to now. Yes, neighbors and people living on campus will be extremely and severely impacted by all of this noise. This will be terribly disruptive to the families and children on campus. Loud noise can be very intrusive when it goes on and on unabated. Kid's bedtimes, dinner conversations, the right to peace and quiet enjoyment in one's own home or yard, and getting some uninterrupted sleep after 9:00 PM will be dramatically compromised. The DEIS proposes no mitigation measures for this operational noise and states just one possible mitigation measure: “to prohibit or restrict the use of loudspeakers”. The Parks Department can and should do much more to address noise pollution. You don't have to be an expert to know that fencing, berms or mounding of dirt and vegetation such as trees and shrubs are used all the time to absorb and mitigate noise. We ask that the planners get serious about protecting the quality of life of park neighbors.

6  
NOI4

We are very concerned about the increased traffic on and around the campus. The safety of pedestrians, especially the children, will be put at risk by all these cars coming and going. It's a problem right now with people zipping around the park. Yet, the DEIS does not even discuss the impact of increased traffic on Sportsfield Drive and cars traveling through the campus to get to the Sports Fields. This overlooked issue needs much more thinking and planning to protect the safety of all park users, in particular our residents.

7  
TRAN2

To date, we think the City, which means the Mayor, the City Council and the Parks Department, has done a good job of balancing the different interests in an effort to develop the Park in a manner that can accommodate many uses for the benefit of the broader community. The City has certainly demonstrated vision, leadership and compassion in its commitment to housing for homeless families and individuals at Sand Point. It would be a tragedy if the message now, from the City to the residents at Sand Point, is that “You don't really count and it's ok to subject you to an intolerable living environment where excessive lights and noise disrupt your lives continuously because we need more sports fields”. Sand Point is a safe haven, a sanctuary for people of all ages who come from a state of crisis with the hopes and dreams of a better future. Sand Point is special because the environment promotes health and well being especially for the children. Hundreds of homeless people have already experienced the blessings of Sand Point with thousands more to follow. You can preserve this blessing and have more sports fields.

8  
SEPA1

We recognize that many people and groups have made compromises as the planning for the reuse of Sand Point has gone forward. Certainly no single group has made more compromises than the neighbors that live to the south of the park and west of Sand Point Way. We think the concerns of our neighbors are real and legitimate. In the spirit of fairness and finding a win-win solution, we think the City should modify its proposal to accommodate their perspective and to maintain the balance of interests that you have worked so hard to achieve. The DEIS should

include off-site alternatives for sports field development. This would lessen the pressure to develop large numbers of play fields all at the same location at Sand Point--which results in unacceptable impacts on residents living on-site as well as in the adjacent communities.

In your honest efforts to address the shortage of sports fields in Seattle, you are forgetting the unique opportunity and promise that Sand Point Magnuson Park represents. Please exercise your stewardship wisely and maintain the vision shared now by so many to create a "truly spectacular" urban park that provides an oasis for all the citizens of Seattle.

Sincerely yours,



Jan Dickerman, President

Enclosure

cc: Mayor Greg Nichols

Councilmember Steinbrueck, President and Chair, Parks, Education & Libraries Committee  
Board of Park Commissioners: Bruce Bentley, Chair, James Fearn, Jr., Susan Golub, Yale O.  
Lewis, Jr., Sarah Neilson, Kate Pflaumer, Kathleen Warren

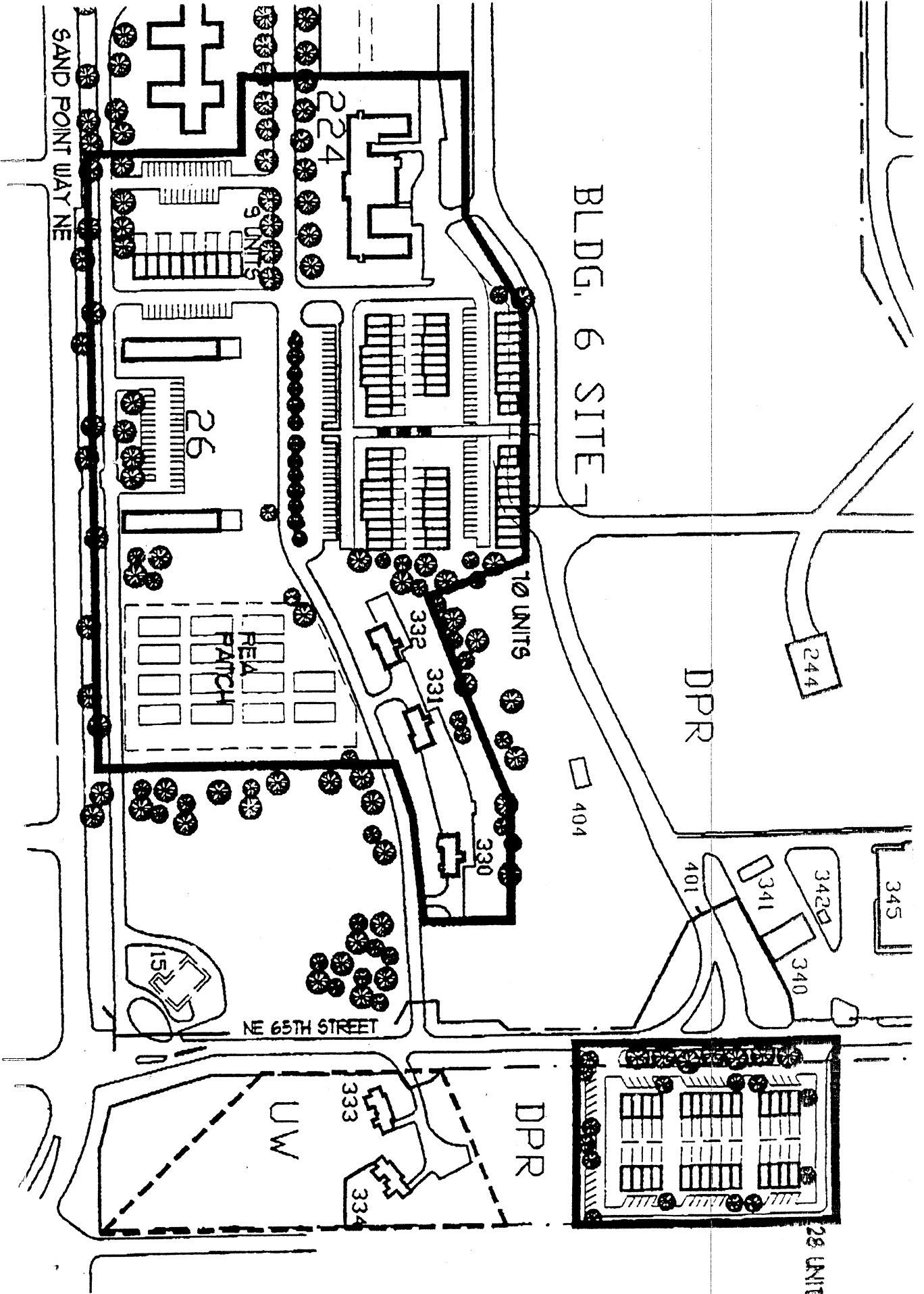
Ken Bounds, Superintendent, Seattle Department of Parks and Recreation

Mike Fenton, President, Windermere North Community Association

Bonnie Miller, President, Hawthorne Hills Community Council

Bob Lucas, President, View Ridge Community Council

Board of Directors of Sand Point Community Housing Association



**Sand Point Community Liaison Committee**  
**P. O. Box 15580**  
**Seattle, WA 98115-0580**  
 February 25, 2002

Eric Friedli, Director of Operations  
 Magnuson Park  
 4700 Sand Point Way NE  
 Seattle, WA 98115

Re: Liaison Committee comments relating to Park Department Draft Environmental Statement (DEIS) about the proposed Magnuson Park Drainage, Wetland/Habitat Complex and Sports Fields project, and the Department's assessments "about significant adverse and positive impacts likely to occur."

**General Comments**

1. The Liaison Committee believes that the DEIS must be a single document which addresses the cumulative environmental impacts for the entire area, border to border, of Magnuson Park. Since this document, now before the public, considers but one section of the Park, its validity is subject to question. The Rules of the State of Washington's Administrative Code specifically address and prohibit the piece-mealing (section by section) of environmental considerations such as this document does.
  
- \*Special note is taken to the statements made in the summary opening statement, 1.2 Purpose and Use - paragraphs 3 & 4. Described is a 1996 review which, among other issues, included vague and general directives relating to ball fields and wetlands. It was given an "EIS" title. During that same period, directly adjacent to the ball fields, the Transitional Housing for the Homeless was started. Created were incompatible park land uses, side by side. Did not the Park Department, early in this process, have the responsibility to make special note of the inevitable conflicts and move to make changes for the better while there was time? And before proceeding now, should not the department now be better off to recognize the environmental conflicts and act to make changes for the betterment of the on-site housing, and the surrounding community, with a changed perspective?
  
2. The guiding principle of "*balanced use*" of Park property for the benefit of all members of our community to enjoy, has been lost. "*Balanced Use*" is implicit in the larger Community's vision for Magnuson Park, and has been a constant direction since the 1970's. It has been included in all previous planning work where the Community has had a voice. "*Balanced Use*" recognizes that each Park user has a stake in the Park and shares equally in its use, its care, and enjoyment.
  
3. There are too many ball fields in the Park. The Principle of "*balanced use*" of park property has been lost. Park staff has listened to very organized "special

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SEPA5

2  
SEPA3

3  
SEPA3

interest groups", and has responded far too generously to their demands. "Special Interest Groups" appear to have no concern over the fact that their demands will create negative impacts on other uses, on-site housing, and surrounding neighborhoods. The Park Department must take that responsibility.

Park planners would serve the public better if they looked at the "dense pack" concept in the Citizens Plan, which allows for multi-sports use of single fields by relating use to seasonal demands.

3  
SEPA3  
CONT

4. Passive Park Users It is an error of omission that the DEIS where does not consider largest group that uses the Park. They are the casual group of strollers, the walkers, those coming to enjoy the waterfront (both north and East), families, and 'let's have a picnic, or a dip in the Lake users.

4  
REC1

During the warm summer months the walkways are congested. Their numbers should be counted. We feel those numbers will justify a special category.

5. The Transportation Plan is inadequate. First, the plan has to be related to the entire park. There is an absence of a thoughtful circulation plan for walkers, for viewers, automobiles and for bikers. Addressing parking for ball field users separately will not work. Seasonal parking demands should be addressed.

5  
PD8

Bicycles (The statement on Bicycles, submitted at the Feb. 3, DEIS hearing by JW is supported by the Liaison Committee. Key elements are:

- 1) Bicycles should be included in the Park transportation plan.
- b) Bicycles are recognized as a non-powered vehicle, and, as a vehicle are required to obey all traffic laws and safety regulations. These include:

Traveling at speeds neither slower nor faster than ongoing traffic.

Bicycles are not allowed to be driven on sidewalks.

Pedestrians have the right-of-way at all times

- c) Bicycle and Pedestrian Travel must be separated. Bikers tend to be aggressive in their travel. The separation must be clearly defined at the beginning, when establishing a clearly marked new route.

6  
PD8

Allowing bikers and pedestrians to mix on the same walkway is a grave error.

6. Ball Fields

(1) Night Light The Sand Point Community Liaison Committee, by unanimous vote, supports the position of the View Ridge CC, the NE District Council and others, that there be NO lights, on the ball Fields. The Park Department has made no case to justify lighted ball fields.

Light and glare will downgrade the quality of life of the surrounding community, obviously spoil the view at both day (poles) and night (glare, and

The Transitional Housing Project will be directly affected. It is hard to understand how Parks can justify downgrading that housing when so many dollars and so much effort has been spent to do just the opposite.

7  
L&G2

The Park Department has made no case to support night lighting in the face of the harmful effects on the birds and wildlife in the area.

(2) The comments made on the relatively small amount of electricity used for ball fields shows a lack of knowledge of CL operations. This is a demand for new power. CL's power is finite, there is no "new" power. No more dams will be built. To supply this demand for the 'new', the power has to be purchased, and the cost is high. The effect - raise the rates and all customers will pay. The real source of the "new power" is through conservation. You are asking for others to conserve power so that soccer players can play at night? If it is all put together, just how much "new" costly power is the Park Department asking?

Magnuson Park is but one park among several across the City of Seattle, where the Department is proposing new night lighting for ball fields. And, if all of these costs( new fields power demands, higher rates, etc) is put together, how much actually is the Parks Department asking the public to pay on an?

(5) Noise Those of us who lived on the hillside have for years, experienced the "noise from Sand Point." Contrary to the DEIS says, noise does roll up the hill side for all to hear. This section of the DEIS is deficient, generalizes, and offers no real mitigation measures.

7. Final comments: The DEIS as presented, is an imperfect document. Every attempt appears to have been made, to avoid facing the issue that environmental impacts from this section do affect the entire Park, and beyond. It would seem that those hired to study the impacts were specifically asked to put on blinders, and not look beyond the boundaries of this particular section. If so, the true purpose of this DEIS is lost.

Thank you for the opportunity to make the above comments. I look forward to your response.

Submitted by : Jeanette Williams, Chair  
*Sand Point Community Liaison Committee*

February 28, 2002

Eric Friedli  
Planning and Operations Manager  
Sand Point Magnuson Park  
Department of Parks and Recreation  
7400 Sand Point Way NE  
Seattle, WA 98115  
[Eric.friedli@ci.seattle.wa.us](mailto:Eric.friedli@ci.seattle.wa.us)

CC: Seattle City Council  
Superintendent Kenneth Bounds  
Seattle Parks Board

RE: Comments on the Sand Point Magnuson Park DEIS for Drainage, Wetland /  
Habitat Complex and Sports Fields / Courts Project

Dear Mr. Friedli:

I am writing to deliver the official comments on the Sand Point Magnuson Park DEIS for Seattle Audubon Society, on behalf of our 5500 members.

Seattle Audubon has a long history of involvement at Sand Point Magnuson Park. Magnuson is a very special place; indeed it is one of the City's greatest treasures. Many of our 5500 members come to Magnuson Park to watch birds, observe nature, and to take a break from the stresses of daily urban life. For six years, a dedicated group of volunteers have monitored the more than 150 bird species there, and thousands of volunteers has given their time and energy to restoring natural forest habitat at Promontory Point. Our Nature Day Camp is going into its fourth summer at Magnuson, and will reach over 500 Seattle school children this year. Magnuson's extensive natural shoreline, and mix of wetlands, urban forest and grassland make it a unique urban park and wonderful habitat for a variety of wildlife. These are all reasons why Seattle Audubon has been involved with the Magnuson Park design and planning process from the beginning, fighting long and hard to ensure that unstructured recreational opportunities and wildlife habitat here continue to co-exist successfully, and sustainably, with the many new projects in store.

We have been disappointed at times along the way – the outcome has often been dramatically less than we had hoped for. What we have encountered over the past several years citywide, and particularly here at Magnuson, is a long, and so far, losing battle to retain unstructured openspace on our public lands.

We realize that EIS comments ordinarily point out problems, not offer solutions. However, there are some areas where we think that offering a detailed alternative might be helpful to this particular process, and we have done that where appropriate in these comments.

### Overall comments

- The EIS must require post construction monitoring for all wetlands mitigation. According to a recent King County report, 90 percent of the constructed wetlands in King County have failed to provide adequate wetland functions or have failed to meet their predicted design criteria. Because every constructed wetland is different and, therefore, an experiment, it is critical that there be follow-up monitoring to determine if the designed functions operate as predicted. The proposed wetlands are designed to "polish" the effluent from the athletic fields and parking lots after it has passed through settling basins and bioswales. Over time, non-biodegradable pollutants, including heavy metals, will accumulate in the bioswales and may escape into the wetlands. The wetlands cannot support a natural biota, if they are, in fact, delivering toxic chemicals to the biota, which only monitoring can determine. The monitoring plan must include an adaptive management component so that erroneous assumptions can be identified and corrected.
- We strongly disagree with the "phased environmental review process" for the various planning and project-level activities at Sand Point Magnuson Park. This amounts to piecemealing the environmental review process, which skews the true impacts. We maintain that only a comprehensive Environmental Impact Statement can accurately assess the cumulative, significant, adverse environmental impacts of the various projects.
- The Magnuson Vegetation Management Plan needs to be incorporated into the EIS. For example, what is happening to the tall trees, such as the poplars and cottonwoods, that are currently

1  
WET12  
SEPA53  
PD4



important perching sites for raptors? There must be a certain number of tall trees maintained at all times for raptor perching.

- Magnuson is designated as one of the City's Environmentally Critical Areas for Wildlife. The DEIS does not address how the proposed action could affect this designation.
- We support the intent of the proposed action to provide natural habitat – through the wetlands/habitat complex – at the heart of Sand Point Magnuson Park. The potential to educate Seattle citizens and visitors about the benefits provided by wetlands is enormous. The Education Center (shelter) should receive a high priority - it will serve as a wonderful tool to teach people about the function of wetlands.

4  
WDLF4  
LU15  
S/O2

#### The Proposed Action, and Alternatives – 1.4

We do not fully support or oppose the Proposed Action, the Lesser-Capacity Alternative, or the No Action Alternative. Our support of either the Proposed Action or the Lesser-Capacity Alternative is contingent upon changes, including measuring the lighting impacts to wildlife and habitat, restrictions on the lighting, consideration of natural vs. synthetic turf, reduced automobile parking, increased bus stops and bus parking, and alternative lighting designs.

#### Environmental Impacts of the Alternatives - Table 1.5-1

##### Plants / Wetlands

There is no mention of removal or planting of trees, but there are trees shown in the figures. Some of the early foldouts (showing phasing and the completed wetland) show symbols for trees along the access road. These may be merely the architects conceptual plan and not actual locations, but we need the location of proposed tree plantings and the proposed species, as they affect shading of the wetlands and provide for bird nesting & perching. Since the Vegetation Management Plan does not address new plantings, the DEIS must.

6  
PD4

##### Wildlife

The DEIS states an expectation of an increase in number and species diversity for birds, mammals, amphibians, and reptiles. However, this is contingent on negligible impacts of light spillage from the adjacent athletic field complex and parking lots. Because the impacts to wildlife and habitat from the lighting are not adequately measured in the DEIS, it is impossible to assess this claim. Substantial evidence suggests a *probable* impact of uncertain magnitude on wildlife, primarily birds, insects, *and amphibians and reptiles*, from sports field and parking lot lights.

7  
WDLF1

Lights and Glare

The DEIS omits any analysis of the effects of direct, spill, and/or glow from the lights on wildlife, including birds, mammals, fish, reptiles, and amphibians, or plants. This is a glaring omission.

7  
WDLF1  
CONT**Alternatives including the proposed action – 2.0**

Pg 2-4, ¶2 – The interior portion of the site is a wetland, therefore will Parks need to obtain a CWA Section 404 permit to fill it?

8  
SEPA9

Pg 2-10, ¶2-5 – What is the on-site material is unsuitable for athletic field subgrade?

9  
PD2**Wetlands / Habitat Complex – 2.2.5**General comments:

We believe this is a good design for diversity, especially the ephemeral ponds for Pacific Chorus Frogs (the best population in a Seattle park); the all-year ponds separated from Lake Washington to avoid bullfrog invasion and embayment; the added shoreline habitat for young salmon; and the added foraging area for shorebirds.

The wetlands construction will likely take 8 years, if not more. Will any of the wetlands complex be completed earlier than that, such as the lagoon? Water flow onsite is critical to the success of the wetlands. Where will Phase 2 drainage go during the 5 years until Phase 3, when the wetland construction begins?

10  
PD1Concerns:

The five drainage “chains” across the site to “treat” the runoff from the sports fields complex must be monitored to be sure they are working effectively, and they also need regular maintenance to insure that heavy metals and other contaminants are removed periodically. This is not addressed in the DEIS.

The drainage from the Off-Leash Area into the wetland complex must be monitored, and the water should be tested on a regular basis for e-coli and giardia contamination. Mammals in the wetlands and the water itself could become infected, and the area unsafe. A regular testing program should be required as mitigation in the FEIS.

11  
WTR4  
SEPA5

Pg 2-18 What is the scientific basis for the site drainage pattern, the “bathtub” pond drainage? Is this a proven design, or are the architects

12  
WTR6

experimenting? Will it work in heavy rainfall? If this design is based on a successful, similar design elsewhere, it should be stated.

12  
WTR6  
CONT

**Pg 2-20** The report states that the marshy pools would be planted with “native shrubs and trees in order to create a highly complex mosaic of wet herbaceous and upland woody habitat.” We agree with this statement, and would like to see the Vegetative Management Plan for Sand Point Magnuson Park incorporated into this document.

13  
PD4  
PD3

Tall trees must be part of the wetlands vegetation. They provide raptor perches, nesting, windbreaks, shade, and to shield the wetlands from artificial light spill from the sports fields.

The marshy ponds are shown as regular, rectangular bathtubs. The function of these ponds should be retained, but the ponds should be in more natural shapes.

The effects of lighting on wetland plants is unknown. The effects need to be monitored. Effects of lighting on wetland amphibians includes altering mating behavior and foraging behavior. There should be hills and trees in place to shield the wetland areas from the sports complex lights. Lights should be moved away from the edge of wetlands, so that the wetlands are not in the 150-foot spill area.

14  
WDLF1

**Pgs 2 -22-24** Please state the maximum depth of the lagoon, and any effects on it of Lake fluctuations.

15  
WTR7

### **Circulation/Trail System - 2.2.7**

The Cross-country Trail, circumnavigating the wetland/habitat complex, should be 8 feet wide. Eight feet is wide enough for joggers and emergency vehicles. A 12-foot trail would eliminate significant habitat, and would also create a dike. Provisions need to be made for animal and water flow through the trail. Crossing the trail on the surface could be damaging to the frogs and other wildlife; wide culverts for such wildlife should be provided in convenient spots.

16  
WDLF3

### **Lighting Systems – 2.2.9**

Seattle Parks and the City of Seattle need to be very careful in designing lighting systems. They need to look not only at brightness but also the kind of wave length to measure effects on wildlife. They should consult experts on lighting who are more knowledgeable about the effects of lights on wildlife and humans. Both Chris Israel ([www.LightingDesignAlliance.com](http://www.LightingDesignAlliance.com)) and Jack Sales

17  
WDLF1

([www.DarkSky.org/ida/fixtures](http://www.DarkSky.org/ida/fixtures)) presented recently (February 2002) at the Ecological Consequences of the Effects of Night Lighting Conference in Los Angeles, sponsored by Urban Wildlands ([urbanwildlands.org](http://urbanwildlands.org)).

The section on alternative actions does not, but should, provide for different types of luminaires using, for example, low-pressure sodium vapor and focused beams to decrease glare and spill.

#### Construction Actions - 2.2.11

The Vegetation Management Plan (VMP), which we helped devise, very clearly did not include planting in and around the proposed wetland complex. It was to deal with existing vegetation. Therefore, it is confusing to read that new plantings (including the wetland complex) will be consistent with the goals and objectives established in the VMP.

The EIS should better incorporate the approved Vegetation Management Plan, particularly as it incorporates the use of large trees, and most particularly in the wetland/habitat area. Large trees are needed for shade, and perching and nest building by birds, in this area. Plans for these large trees must be clearly stated in the EIS.

The DEIS does not address the specific kinds of native plant vegetation to be employed in the wetland/habitat area. Cross-referencing between the Vegetation Management Plan and the DEIS is too difficult. The EIS should include an explicit phased planting scheme.

#### Construction Phasing- 2.2.12

Phases 2, 3 and 4 show proposed beginning dates for a variety of activities including excavation of the wetlands, but no milestones or ending dates. Will each phase end before the beginning of the next one? Phase 4 indicates completion of wetland habitat excavation, but does not indicate completion in terms of revegetation or a functioning wetland.

The various phase descriptions are not accompanied by timelines or funding lines. Currently, approximately 12 million dollars are allocated for this project. If no more funding were forthcoming in years 2002, 2003 or 2004, what would be the actual phasing of athletic field construction, wetland construction and parking lot construction? That is, in addition to alternatives in the form of No Action, the Preferred Alternative and a second alternative, which is merely a reduced version of

17  
WDLF1  
CONT18  
PD419  
PD1

the Preferred Alternative, we need alternatives that indicate what activities would be conducted with the original funding and with funding contingencies.

It would be very helpful to provide a tentative budget of each phase.

### Off-leash Area – 2.6.3

The OLA is not included in the DEIS. However, potential surface drainage from the OLA to the playfields and wetlands should be addressed in the final EIS. In addition, the EIS must address the potential for off -OLA-site contamination from Giardia and fecal coliforms.

## Affected Environment, Environmental Impacts, and Mitigation Measures – 3.0

### Earth –3.1

3.1.2.1 – Does not address that not all the fill excavated will be appropriate to use on-site. For example, the peat (which is under the runway) cannot be used for the sports fields.

### Plants and Wetlands – 3.3

3.3.1.5 – The wording of this paragraph is confusing and does not adequately distinguish as to which of the orchid species is present at Magnuson and which is a state-listed species.

3.3.2.3 – Increased human use. The DEIS lists specific projections for increased use of the Park – such as an increase in the number of people that will be using the Park, an increase in the number of cars, etc. But it does not project increases in some of the impacts from these additional people. For example, many of these new users will bring their dogs and let them off-leash. We already have a very serious problem with off-leash dogs outside of the designated OLA. It is logical to conclude that with an increase in the number of Park visitors, there will be a correlative increase in the number of off-leash dog (violations) in the Park. These impacts, and how the Park will respond, such as increased educational signage and enforcement fines, are not addressed.

### Animals and Fish – 3.4

Pg.3-37, ¶ 4 "Park management staff, citizen volunteers and user groups would, to varying degrees, help to monitor user behavior . . ." Park use is stated to increase

seven-fold and many amenities may become attractive nuisances. For some examples, the wetlands may invite off trail excursions unless fenced. Shelters provide for illicit activities and graffiti. All structures invite vandalism. Dog owners will, through ignorance or willfulness, run their dogs off leash outside the OLA. What is proposed for a Parks presence beyond management staff and maintenance employees? User groups have no police powers and will be reluctant to instruct visitors as to proper behavior.

24  
WDLF5  
CONT

Pg 3-35-41 (and elsewhere) Most long-term impacts of wetland siting and construction, artificial lighting and human disturbance are unknown. Therefore the EIS should require long-term monitoring of impacts during and after construction.

25  
WET1

3.4.2.2. Impacts of the Alternatives – The entrance to the lagoon is designed to exclude alien species; e.g., large-mouth bass and bullfrogs. Would the exclusion devices keep out native species as well? What is the plan for removing exotic plant and animal species once within the park?

### Light and Glare 3.9

#### A. Effects of Lighting on Wildlife and Habitat

The Sand Point Magnuson Park DEIS underestimates the level of spill lighting that will reach into the wetlands and the lake shoreline beyond. If the level of spill light at 150 ft is 1.0 foot candle (3.9.2.2), then the level of spill into the wetlands will be one hundred times brighter than the full moonlight. Calculations of incident radiation from the light source do not include scattered and reflected light from field surfaces or scattering from water droplets (fog) nor do they include the overall level of light from 640 luminaires.

The DEIS does not differentiate between the level of spill lighting from full cut-off and shielded conventional lights, nor does it describe the impact of glare on the wetlands, which are lower in elevation than the sports fields. Section 3.9.5 speaks to the significant glare impacts on residential communities within the park and possibly at Radford Court at the park's south border but does not describe the effects of that level of glare on adjacent wildlife and habitat.

Artificial lighting may reduce the population density of grassland nesting birds as far as 250-300 meters from street lighting (Urban Wildlands Group). Street lighting produces significantly less light than the proposed sports fields will.

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WDLF1

Seattle Audubon is concerned that the greatly increased artificial lighting will affect many species within the park. While some of these effects are described in the DEIS, no adequate mitigation is proposed.

#### B. Birds

Artificial lighting will affect the species composition of the park. For example, there will be more crows, which are aggressive, and increased populations can be extremely detrimental to other native bird species. There will be fewer owls.

The effects of extended daylength on physiological, hormonal and behavior patterns has been well documented. Artificial lighting affects reproduction, molting, fat deposition, foraging, courting and mating rituals, as well as preparation for migration in many bird species. Artificial lighting also disorients migratory birds, especially during cloudy or foggy weather and on moonless nights.

#### C. Amphibians

Nocturnal frogs and toads lose their visual acuity and ability to consume prey under artificial lighting. If night is not sufficiently dark, some species will not forage and will disappear. Artificial lighting increases predation on amphibians. Herons have been observed feeding under artificial light. Amphibians take up to 5 hours to adapt to change in ambient light levels. They lose visual acuity for feeding and experience a "period of blindness" leading to increased predation.

#### D. Bats

Faster flying bats are attracted to street lights where there is a greater abundance of insects. The overall effect is to reduce the diversity and abundance of insects, many of which are beneficial, by making bat predation more efficient. Slower flying bats avoid street lights and reduce their predation. Thus there could also be changes in the bat populations.

#### E. Fish

Studies in the Pacific Northwest report potential changes in fish migration behavior and the distribution of fishes in night-lighted areas. Such changes potentially increase mortality risks for salmon.

#### F. Terrestrial invertebrates

Insects are attracted to brighter lights. Low pressure sodium lights, or yellow light, attract fewer insects, decreasing their loss to predation.

#### G. Aquatic invertebrates

Zooplankton do not migrate to the surface to forage on algae under higher light levels. Daphnia migrate farther up and down the water column under dark night conditions. This restricted migration could increase the level of algae and harm the aquatic food chain. Open water could be reduced or eliminated by floating algal mats.

26  
WDLF1  
CONT

#### H. Habitat quality

Artificial lighting fragments and degrades habitat. Wildlife that experiences an increase in predation will avoid lit habitat, thus decreasing their population density. Plants in close proximity to lighting will delay loss of foliage, will bloom again in autumn, and will accelerate branch growth. Lighting also adversely affects germination.

#### I. Concerns not addressed in DEIS

We have several concerns about the effects of lighting that were not addressed in the DEIS:

- 1) The DEIS underestimates the reach of spill lighting into the proposed adjacent wetland and its resultant effects on habitat and wildlife.
- 2) If the proposed sports field lights are on until 11pm nightly, they will extend the daylength from 2.5-7 hours per day depending on the season. The DEIS offers no plan to mitigate the effect of extended daylength on wildlife.
- 3) The DEIS has not adequately measured the effects of the proposed lighting under wet conditions.
- 4) There are no plans to measure the effects of spill, glare and reflected glow in the wetland over time. There may be as yet unknown effects to mitigate in the future.
- 5) The DEIS has not analyzed the potential impacts of the cumulative effects of all lighting in the park – sports fields, parking lots, tennis courts, off-leash area, and current lighting on buildings and streets within the park.
- 6) Whichever types of lights are used, most of the light will be reflected back into the sky, and the skyglow will be substantial, significantly impacting birds migrating at night.
- 7) Impacts to the Lake Washington ecosystem, which is a big space with little light spillage currently, are not addressed.
- 8) The power usage increase is understated, particularly increases over peak times.

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WDLF128  
L&G329  
WDLF130  
ENR1



- 9) The type of luminaire (high pressure sodium, low pressure sodium, halogen or mercury vapor) is not discussed.

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PD9

J. Possible mitigation measures

The DEIS includes comments about some of these effects, but it does not suggest adequate mitigation measures.

- There is no alternative plan to create new sports fields without artificial lights, or with natural instead of artificial turf..
- There is not even an alternative plan to eliminate the lights that are not full-cutoff at the two large baseball fields.
- There is no mention of limiting the hours of sports field lighting, particularly during breeding and migration seasons by vertebrates.
- There is no mention of planting vegetation that would shield the wetland from the effects of night lighting.
- There is no plan to reduce sky glow by increasing light absorption on the ground; for example using a color such as red for the artificial turf to better absorb the light, and be less reflective of dominant wavelengths of luminaires. We strongly recommend the use of low pressure lamps, which emit in a very narrow bandwidth, as being least harmful to plants and animals.

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SEPA333  
WDLF1

Transportation - 3.12

The traffic impacts from mass entrances and exits of cars during game times are very understated.

34  
TRAN1

The structure of the overall plan unfortunately encourages cars. There are only two bus routes (metro 74 and 75) that provide service to Sand Point Magnuson Park, and they have limited hours of operation. Transit access to the park needs to be vastly improved to support the scale of the proposed action. The DEIS does not address any alternatives other than having people who come to the Park do so in cars that will need adequate parking space. Why have you not considered even some simple incentives, such as priority parking for carpools?

35  
TRAN4

Thank you for the opportunity to convey our comments, questions and concerns with regards to the Sand Point Magnuson DEIS.

Sincerely,



Lauren Braden  
Advocate for Wildlife Habitat



Marina Skumanich  
Conservation Chair

## Bibliography

Mockler, A., L Dasey, M. Bowles, N. Gillen and J. Hansen. 1998. Results of Monitoring in King County Wetland and Stream Mitigations. King County Department of Development and Environmental Services, King County WA

Longcore, Travis, Ph.D. and C. Rich. J.D., M.A. A review of the ecological effects of road reconfiguration and expansion on coastal wetland ecosystems.

Nightingale, Barbara & Charles Simenstad. Artificial night-lighting effects on salmon and other fishes in the Northwest. University of Washington, School of Aquatic and Fishery Sciences.

Nightingale, Barbara. University of Washington, School of Aquatic and Fishery Sciences. Personal Communication. February 27, 2002.

Outen, Alan R. The possible ecological implications of artificial lighting. Hertfordshire Biological Records Centre. 1998.

The Urban Wildlands Group, Inc. November 14, 2001.  
Impact of outdoor lighting on man and nature. Health Council Report No. 2000/25E. The Hague, Netherlands. November 30, 2000.

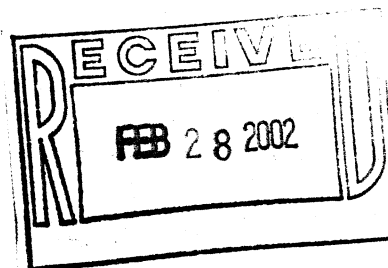
The Urban Wildlands Group. Ecological consequences of artificial night lighting: bibliography. <http://www.urbanswildlands.org/nightlightbiblio.html>. January, 2002.

Wingfield, John. Ph.D. Chair, University of Washington Department of Zoology. Personal Communication. January 28, 2002.

Renée Barton  
Seattle Residents for Fair Field Lighting  
11024 - 30th Ave NE  
Seattle, WA 98125

February 28, 2002

Eric Friedli  
Planning & Operations Director  
Sand Point Magnuson Park  
Dept. of Parks and Recreation  
7400 Sand Point Way NE  
Seattle, WA 98115



Dear Mr. Friedli:

**RE: Sand Point Magnuson Park Draft Environmental Impact Statement**

Thank you for the opportunity to comment on the Sand Point Magnuson Park DEIS.

Sports Lighting - In section 3.3.2.3 of the DEIS, it is stated that "The lighted fields closest to the wetland/habitat complex (Fields 6,9,10,13, and 15) would use full-cutoff technology, which minimize glare, spill lights and sky glow that escapes from the fixtures and the illuminated area" (p. 3-23). From what I have seen by comparing the full-cutoff downlights at JV-Bothell High School Field and the internally and externally shielded floodlights at Friday Harbor High School and by factoring in the different illuminance levels at each field, full-cutoff lights have the enormous drawback of what I call "backspill" - light that spills behind the light pole and into wildlife habitat areas. At the JV Bothell field, there is an enormous quantity of light that spills behind the poles, such that I and my neighbors who visited the site could read by the light 150 ft away from the end of the field! In addition, it is my understanding that full-cutoff lights have poorer cutoff angles in front of poles, making them less able to control how much light escapes across the field and beyond the other side. Fully shielded floodlights would better protect wildlife and wildlife habitat.

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WDLF1

Skyglow - Prevention of skyglow also depends on how much light that is reflected from the field back up into the sky. It is not at all clear that full-cutoff lighting provides an advantage in preventing the reflection of light back into the sky.

2  
PD9

Spill Light and Glare containment standards - In section 3.1.1.1 of the DEIS, it is stated that the Parks Dept. will attempt to contain light spill to 0.8 foot candles (fc) at residential property lines. This is the Illuminating Engineering Society of North America (IESNA) standard for lighting an E3 zone, the second brightest zone of four zones (pp. 10-12 of Lighting for Exterior Environments, recommended practice 33 of the IESNA). With all of its wildlife and unlit areas,

3  
PD9

Magnuson Park would be better classified as an E2 or E1 zone. Please find attached a copy of our consultant's report which describes how spill and glare containment can be achieved at the E2- or even E1-zone level and why it is important to do so. Broadly speaking, better light trespass and glare containment can be achieved with taller poles and tighter aiming angles. I hope that the Parks Dept is not using shorter poles and wider aiming angles at the expense of neighbors and wildlife at Magnuson Park. I do understand that equipment to maintain higher poles is costlier, but it is important to light right when lighting at all.

3  
PD9  
CONT

I also urge you to consider lighting fewer softball/baseball fields. These lights are especially invasive of surrounding neighborhoods because of the brightness (50 foot candles on the infield) and height requirements for vertical foot candle illumination. It would be better to privilege scheduling of softball/baseball games during daylight hours and light only for bi-directional field sports such as football, soccer, rugby.

4  
SEPA3

Finally, the placement of ANY lights at all at Magnuson Park needs to be SERIOUSLY questioned. Protection of wildlife in this area is important. Highly light-sensitive threatened Chinook salmon are found along the shores of Lake Washington. If these salmon behave the way salmon do in my neighborhood of Meadowbrook, they will be found "hiding out" in the recreated wetlands. It is thus very important to keep artificial light away from these wetland habitat areas.

5  
WDLF1

Because of the natural park like setting at Magnuson, the IESNA standard for the E1 zone seems to be the most appropriate. The lighting standard for the E1 zone is for "areas with intrinsically dark landscapes" or "areas of outstanding natural beauty." Such areas should have a 0.1 fc maximum illuminance level before curfew and a 0.0 fc illuminance after curfew. Because of the wildlife in this area and their sensitivity to artificial light, curfew should be the setting of the sun and there should be no artificial lighting past curfew.

There is also a low-income transitional housing unit only a few hundred feet away from the proposed lit fields. Single parents have enormous time costs when traveling to work by bus and dropping their kids off at school. As we heard at the public hearing on February 4, such families, in addition to many other people, do go to bed as early as 9 pm. It is important for all people to have quite wind-down time before bed.

6  
L&G2

Residents up the hill from the park are currently able to enjoy the public view corridor afforded by Magnuson Park and the Cascade mountains behind. Lights, especially lights that are too short and must therefore stare straight out into the residential neighborhood, are inappropriate in a view corridor. In addition, noise

rises uphill. The sound of players screaming into the night on 11 lit fields is excessive and should not be permitted.

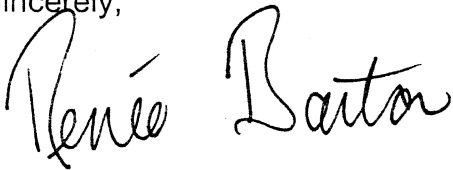
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NOI1

Lights and noise will adversely impact the wildlife habitat, low-income housing, and residents who live up the hill.

I support development of natural grass fields and limited synthetic fields at Magnuson, but not lights. It will also be important to provide adequate scholarships for the children of low-income families living in the park, so that they, too, can participate in daytime sports activities on the fields in front of their homes.

8  
S/O4

Sincerely,

A handwritten signature in cursive script that reads "Renée Barton". The signature is written in black ink and is positioned above the printed name.

Renée Barton

Attachments (2)

P.S., please see public testimony for my concerns about cleaning and controlling the flow of run-off from parking lots into wetlands and need for cleansing filters and greater detention before water reaches wetlands.

October 2, 2001

## Review of Seattle Parks and Recreation Ballfield Lighting Study

The authors did a thorough review of existing recommendations regarding sports lighting criteria and light trespass issues as published in RP-11 and RP-33. Their recommendations, though, were only partially substantiated. What are missing were examples of why the most stringent light trespass values could not be met. As a result, the compromises appear to favor the sports field lighting.

Sports lighting is extremely complex since the goal as stated in the report is to "enable safe nighttime play". Another goal is to design sports lighting that achieves this goal, and yet is also environmentally sensitive to surrounding neighbors and sensitive wildlife. With careful design and planning, Seattle could challenge designers and manufacturers to meet these goals. Instead of writing, "This extension of playtime through illumination increases the number of hours the field can be used, maximizing the owner's return on investment," a message of community support and sensitivity may be more appropriate.

Dr. Lewin is correct about the "ease of illuminance" as a light trespass measure. Yet in reality, it is the luminance or brightness of the lights that annoy neighborhoods. Aiming floodlights away from neighbors, limiting their brightness with greater shielding and limiting the aiming angles will produce excellent results. The light trespass values listed in RP-33 and RP-11 are for serious light trespass, which means you will have complaints if you exceed those values. In some instances, street lighting may exceed the values on the property line. But street lighting has a single luminaire near the property, aimed away from the house. In some extreme cases, house side shields are installed on street lights when the neighbor is very sensitive to the light trespass. Seattle's challenge is to design fields that do not exceed the light trespass levels.

Listed below is a brief list of recommendations that should be examined and tested out before standards are written. By challenging designers and manufacturers, we may find that the sports fields can be lighted to meet each neighborhood's issues.

1. Locate fields with sensitivity to the surrounding neighborhood, such that floodlights are not aimed directly into sensitive areas.
2. Determine with the community the neighborhood sensitivity to light trespass: E1, E2 or E3 environment.

3. Use higher poles (70' to 100') such that aiming angles are less than 60 degrees from vertical.
4. Specify quality sports lighting equipment that offers multiple types of shielding for the luminaires including internal and external shielding.
5. Avoid aiming floodlights directly onto sensitive neighborhood areas.
6. Obtain calculations from the manufacturers that indicate the design meets sports lighting criteria and the light trespass criteria. Obtain a letter of compliance from the manufacturer.
7. Maintain and replace lamps frequently (at least by 70% of life). This will avoid initial "over design" resulting in lower initial lighting levels. Light trespass values occur any time over the life of the lamp, including initial values.
8. Work with the community on nighttime activity schedules. Observe curfews.

I do think that a community compromise is possible. Sports lighting is a challenge, but when designed correctly can meet the challenges.

A handwritten signature in cursive script, appearing to read "Nancy Clanton".

Nancy Clanton, PE  
President

Seattle Lighting Report  
Specific Issues  
Nancy Clanton

Introduction

- Reword sentence that includes "maximizing the owner's return on investment" to a community driven statement of "while being environmentally sensitive with minimal light pollution and light trespass".

Light Trespass Issues

- Remember, the light trespass levels listed in RP-33 and TM-10 are levels for serious light trespass, not necessary "good" design. If the lighting levels are exceeded, there most likely will be a complaint. So, selecting environmental zones is very important, and may not apply City-wide. Each neighborhood should be looked at closely and evaluated individually. Even though the ultimate goal is to provide lighting for safe and effective play, it should be designed such that the surrounding communities are not compromised. That is why the light trespass research and recommendations are so important to follow. There are environmental zone choices for a reason based on actual research. Some neighborhoods may be E1 and others may be E4. Each neighborhood must be evaluated.
- With high enough poles, internal and external glare shielding, and limitation on aiming angles, the different environmental zone light trespass levels should be met. Again, this research is based on serious light trespass where complaints are eminent. After speaking with Dr. Lewin, he agreed that E2 could be met, though E1 may be very difficult. This is an area of research to see if Seattle Parks and Recreation can design fields with these more stringent criteria.
- When measuring lighting trespass levels, the levels are line of sight. This is important because if vertical illuminance were calculated or measured, the levels would be off by the cosine (or sine) of the angle. In addition, a 15 degree cone must be on the meter (standard snoot option with Minolta). Also, light trespass occurs immediately when the fields are first energized. Therefore the values are initial values not maintained.

Lamp color

- There is new research and recommendations concerning light source color. The best composite report is by Dr. Ian Lewin, the same individual who did the light trespass research. White light sources such as metal halide provide superior vision through better clarity and better peripheral vision. Even though high pressure sodium lamps appear to be more



energy efficient, this efficiency does not take into account these vision deficiencies. Therefore, high pressure sodium lamps are not recommended.

NANCY ECKMAN CLANTON, P.E.

**Education**

UNIVERSITY OF COLORADO

Bachelor of Science in Architectural Engineering, December 1975

**Registrations**

Professional Engineer, State of Colorado  
Engineer in Training, State of Colorado

**Honors**

Lighting Group Coordinator for the "Greening of the White House" project  
AIA Colorado North Chapter Contribution to the Built Environment Award 1999  
IESNA 1990 Presidential Award  
Chi Epsilon Fraternity - Civil Engineering Honorary  
Who's Who in Mid-West Engineering

**Professional Affiliations**

Illuminating Engineering Society of North America (IESNA) 1974 to present  
Board of Directors, 1990-1994  
Outdoor Environmental Lighting Committee Chairperson, 1993 to present  
Retail Lighting Committee Member, 1991 to present  
National Society of Professional Engineers, 1975 to present  
International Association of Lighting Designers, 1991 to present  
Board of Directors and Director of Marketing & External Affairs, 1999 - present  
International Dark Sky Association, Board of Directors, 1993 to present  
National Society of Architectural Engineers, 1989 to present  
American Consulting Engineers Council, 1998 - present

**Professional Experience**

CLANTON AND ASSOCIATES, INC.; Boulder, Colorado; principal electrical and lighting engineer for projects including airports, roadway, hospitals, offices, retail, schools, restaurants, sports fields, bridges, health care, libraries, churches, manufacturing, residences, September 1981 to present.

UNIVERSITY OF COLORADO; Boulder, Colorado; special assignment instructor, courses included Illumination I and Electrical Distribution Systems for Buildings.

INDEPENDENT TESTING LABORATORIES; Boulder, Colorado; manager of application engineering services; lighting design and analyses for all types of interior and exterior applications; September 1978 to August 1980.

ORR-SCHELEN-MAYERON & ASSOCIATES; Consulting Engineers, Minneapolis, Minnesota, project electrical engineer; May 1976 to August 1978.

# **Lighting for Exterior Environments an IESNA Recommended Practice**

Publication of this Recommended Practice has been approved by the IESNA. Suggestions for revisions should be directed to the IESNA.

**Prepared by:**  
**The IESNA Outdoor Environment Lighting Committee**

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*Approved by the IESNA Board of Directors, February 27, 1999, as a Transaction of the Illuminating Engineering Society of North America.*

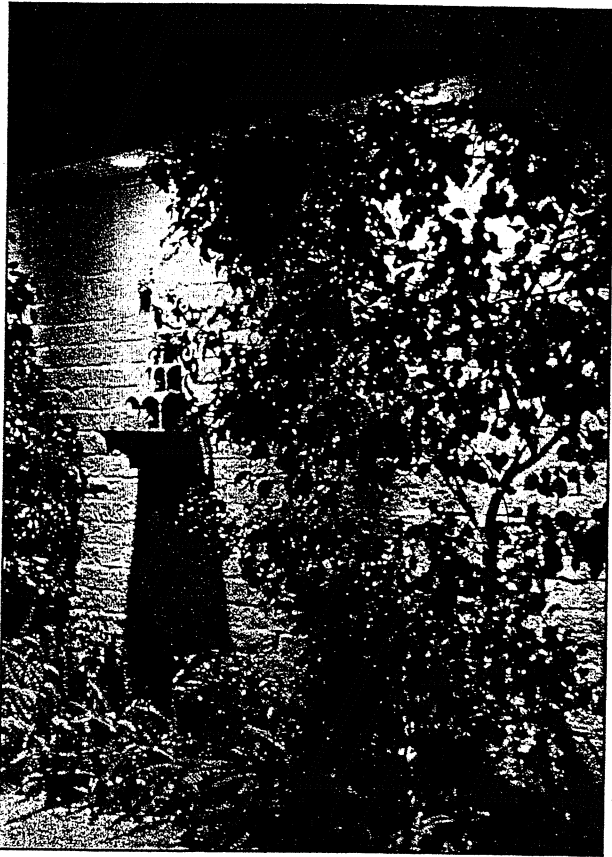
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*Printed in the United States of America.*

Cover: Festival Plaza, Ottawa, Ontario, Canada. Lighting Design: Gabriel/Design; Architect: Griffiths Rankin Cook; Photographer: Adrain Searle.



**Figure 10.** Good surface lighting as provided for the Turner Home, Corpus Christi, TX is achieved with low wattage lamps. (Courtesy of GE Lighting)

A typical situation involves someone walking down a street where there is only one street light at the corner. Does this person feel more secure when close to the street light or when further away? Also typical is when the street is lighted and the adjacent sidewalks are dark. How secure does a pedestrian feel walking down such a sidewalk? Then there are other situa-

tions when the street light appears very bright and everything else appears dark because the pedestrian's eyes have adapted to the single bright source. Under these conditions, could an approaching stranger be easily seen or would he/she only appear in silhouette? If little light falls on a face, the decision to avoid or evade is compromised.

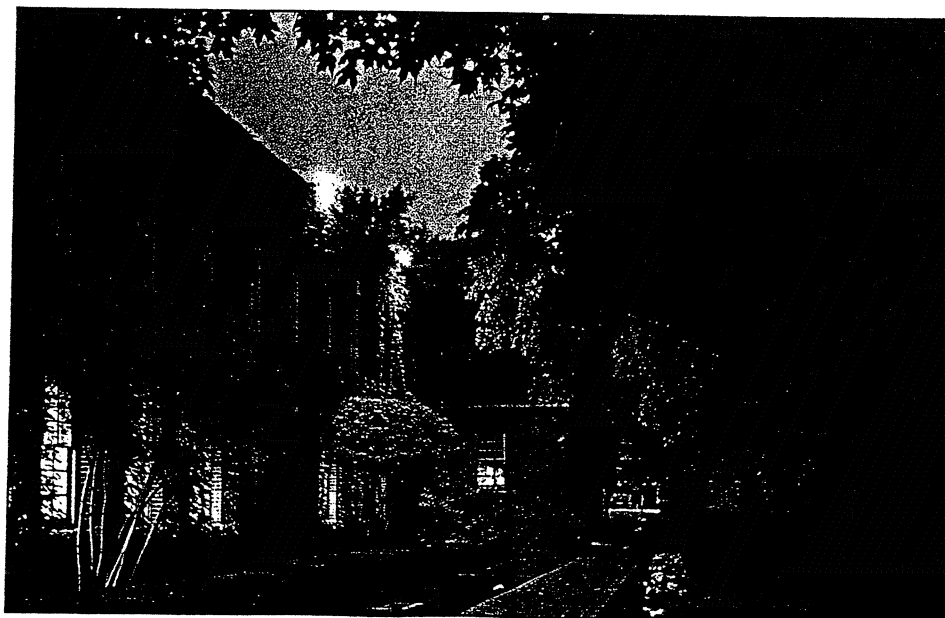
Providing well-defined, appropriately lighted areas in the night environment is a key factor when addressing security related issues. Properly lighted spaces can give the pedestrian adequate reaction time to avoid (or escape from) potential threats. In extreme situations, quality lighting can help the pedestrian identify a safe refuge.

## 5.0 DEALING WITH STRAY LIGHT

As a result of efforts to increase the night time use of facilities, light pollution and light trespass have become extremely important considerations whenever a new outdoor lighting design is being prepared.

### 5.1 Light Pollution

Dust, water vapor, and other particles will reflect and scatter any stray or reflected light that is emitted into the atmosphere. The result is the sky glow found over all urban areas, sometimes called atmospheric or astronomical light pollution (see **Figure 14**). Ground reflected light can account for up to 20 percent of this sky glow. Although this sky glow is not injurious, it does deprive urban residents of the opportunity to stargaze and can hamper astronomers' attempts to view the night sky through telescopes.



**Figure 11.** Layered lighting applied to a walkway adds interest, minimizes shadows, and helps pedestrians gauge distances. (Courtesy of GE Lighting)



**Figure 12.** Effective hazard lighting on stairs. This lighting is uni-directional, emphasizing shadows on stair treads. (Courtesy of David Keith)

Light pollution is of special concern in areas near astronomical observatories. Professional astronomers prefer that nearly monochromatic light sources (such as low pressure sodium) be used outdoors because any unwanted light that enters their instruments can be easily filtered. However, the use of sources with limited spectral composition does not completely eliminate atmospheric light pollution from the telescope's view.

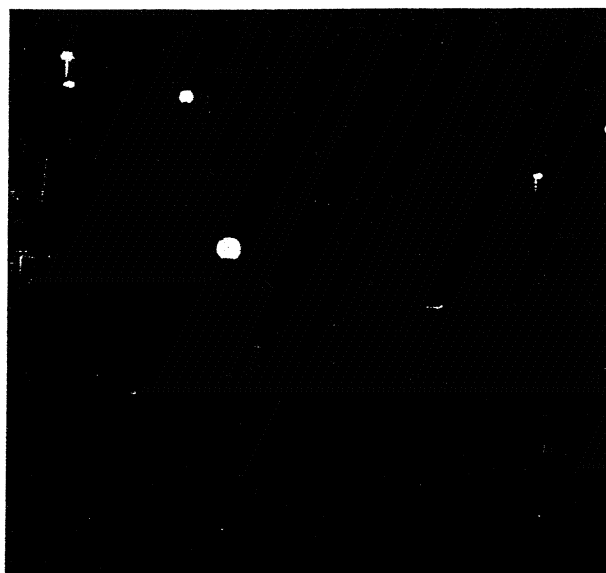
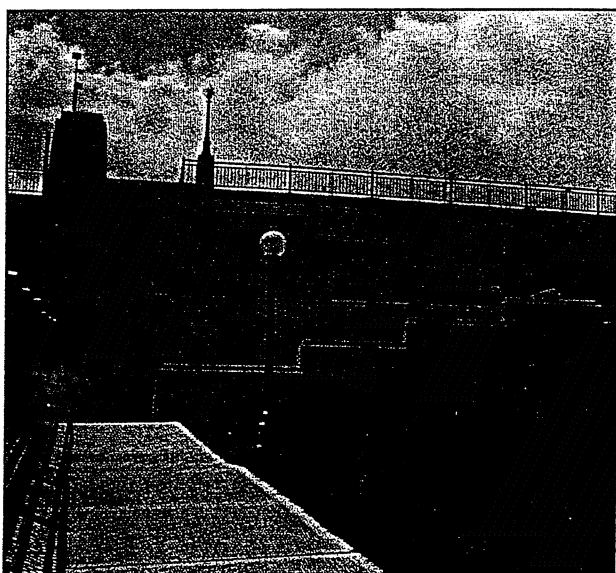
The methods that best control light pollution are:

- *Cutting upward emissions.* Street and area-lighting systems, including lighting for sports activities, parking lots, and vehicle sales lots, should be designed to minimize or eliminate direct upward emission. This will not eliminate all light emission above the horizontal plane, since reflected light from the ground or pavement is an important component of visibility.

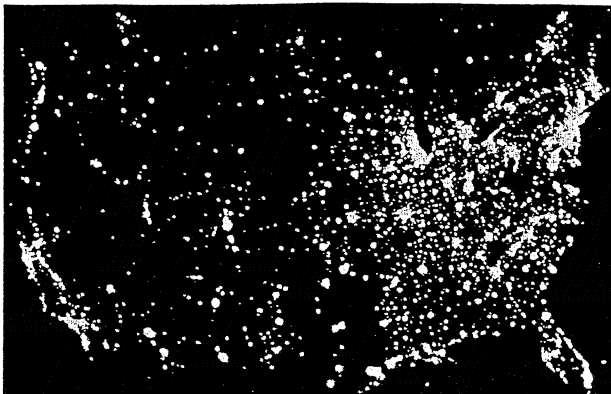
- *Minimizing non-target light.* Lighting systems that project light upward, such as architectural and sign lighting, should be designed to minimize light that does not illuminate the target area.
- *Turning off outdoor lighting during "low" use.* All outdoor lighting, including advertising sign lighting and interior high-rise office building lighting, should be turned off after use unless needed for safety and security. Usually safety and security illuminance, with the exception of street lighting, can be at levels much lower than those needed when the area is in use.

## 5.2 Light Trespass

The topic of light trespass is somewhat subjective, since it often relates to unmeasurable or even undefinable light, which sometimes cannot be controlled. A typical example is the "light shining in my window"



**Figure 13.** Layered lighting along Speer Boulevard in Denver, CO during the daytime (left) and in the same location at night (right). Notice how the stair hazard is emphasized at night with silhouette outlining. (Courtesy of David Keith)



**Figure 14.** This satellite view of the United States at night illustrates the magnitude of upward direct and reflected light from urban areas. (Courtesy of the International Dark Sky Association)

complaint. A "solution" might require eliminating a luminaire deemed essential for the safety and security in a nearby park or street. Another solution may be to shield the offending luminaire so its brightness is not directly visible to the complainant (see **Figure 15**). The offending illuminance is called *obtrusive light* (see **Glossary**).

Light trespass usually fits into one of two categories:

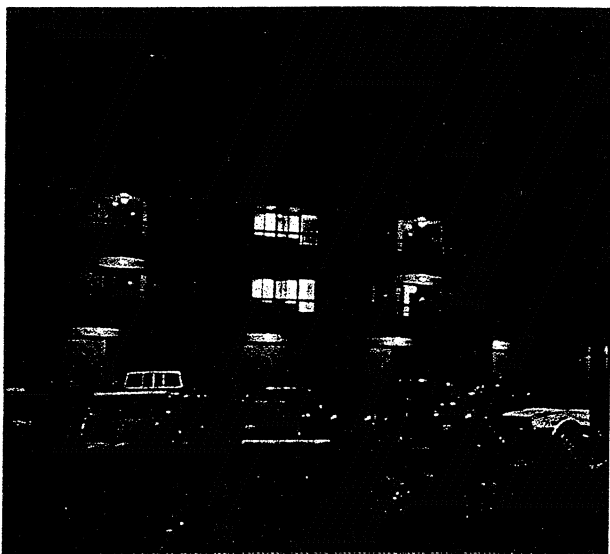
- Adjacent property receives unwanted light (high illuminance levels)
- Excessive brightness occurs in the normal field of vision (nuisance glare)

The following general suggestions will help control light trespass problems:

- Inspect areas adjacent to the lighting design location to identify and consider any potential problems involving residences, roadways, and airports.
- Select luminaires with tightly controlled candela distributions, using sharp-cutoff reflectors and refractors.
- Contain light within the design area by carefully selecting, locating, and mounting the luminaires.
- Use well-shielded luminaires (or select equipment that can be shielded), if a potential problem is found after installation.
- Keep floodlight aiming angles low so that the entire beam always falls within the intended lighted area during (and after) the design and installation process.

Efforts have been made in numerous jurisdictions to write ordinances or bylaws controlling light trespass. These ordinances have met with a range of success, depending on practical enforcement. One method to control light trespass is based on using specific environmental zone descriptions that then underlie any restrictions. The Commission Internationale de l'Éclairage (CIE) has developed a series of four *environmental zones* (E1 through E4) in which different lighting situations can be placed:

**Zone E1:** *Areas with intrinsically dark landscapes.* Examples are national parks, areas of outstanding natural beauty, or residential areas where inhabitants have expressed a strong desire that all light trespass be strictly limited. (This is the most sensitive zone.)



**Figure 15.** The wall pack lighting on these barracks (left) puts too much spill light into the barracks' windows. Alternatively, the carefully shielded luminaires on and around this private home (right) complement the architecture while holding light trespass to a minimum. (left, courtesy of Michael Mutmanský; right, courtesy of OSRAM SYLVANIA)

**Zone E2:** *Areas of low ambient brightness.* These may be outer urban and rural residential areas. Roadways may be lighted to typical *residential* standards.

**Zone E3:** *Areas of medium ambient brightness.* These will generally be urban residential areas. Roadways will normally be lighted to typical *traffic route* standards.

**Zone E4:** *Areas of high ambient brightness.* Normally these are urban areas having both residential and commercial use and experiencing high levels of night time activity.

As defined, these area categories can provide the basis for restricting the brightness that must be tolerated in a specific environment. Within any category, a curfew or "after hours" time may be established, allowing higher lighting levels during those hours when the curfew is not in effect.

Since light trespass is extremely subjective, there is no single set of values/limits that will work in every situation. The report *Light Trespass Research*<sup>5</sup> suggests that light trespass can be evaluated by illuminance values measured at the eye in a plane perpendicular to the line-of-sight when looking at the brightest source in the field of view. This report also stresses the subjectivity of the research and how it may be affected by the personalities and desires of different individuals. Therefore, the following recommendations are only a guideline and framework for setting reasonable levels. Local authorities should increase (or decrease) the values given depending on the specific situation and on community desires.

While these recommendations serve to reduce serious light trespass, their implementation is not a guarantee against objections.

The following are the suggested light trespass limitations from the report *Light Trespass Research*. The specific illuminance values given are measured at the eye in a plane perpendicular to the line-of-sight:

### PRE-CURFEW LIMITATIONS

Zone and Description	Recommended Maximum Illuminance Level
Zone E1 <i>intrinsically dark</i>	1 lux (0.1 fc)
Zone E2 <i>low ambient brightness</i>	3 lux (0.3 fc)
Zone E3 <i>medium ambient brightness</i>	8 lux (0.8 fc)
Zone E4 <i>high ambient brightness</i>	15 lux (1.5 fc)

### POST-CURFEW LIMITATIONS

**Zone and Description** followed by the **Recommended Maximum Illuminance Level** (sometimes with discussion)

Zone E1: *intrinsically dark*

For luminaires or systems which are not for public safety or security, the limit should be (0) zero lux (fc). This is based on the presumption that the environment of such dark areas should not be affected to any extent by electric light sources after curfew hours. Where safety and security are issues, night time lighting is needed. Such lighting should meet IESNA recommendations for the particular property being lighted. Lighting should be designed, however, to minimize light trespass. It is suggested that the subject lighting should not exceed 1 lux (0.1 fc).

Zone E2: *low ambient brightness*

This category contains the most sensitive residential areas (generally dark neighborhoods), with the exception of those areas covered by CIE's E1 environmental zone. It is suggested that the subject lighting be restricted to 1 lux (0.1 fc) or less.

Zone E3: *medium ambient brightness*

The suggested recommendation is that the subject lighting be restricted to 2 lux (0.2 fc) or less.

Zone E4: *high ambient brightness*

The suggested recommendation is that the subject lighting be restricted to 6 lux (0.6 fc) or less.

All these suggestions were developed on the assumption that the affected luminaires are continually on during the applicable night time period. Where luminaires are only on for a short period, these suggestions should not be applied. The intent of these suggestions is to prevent obtrusive light levels from being constantly within view. Therefore, the following section is intended as a rough guideline or framework for setting levels. Local authorities should increase (or decrease) the values cited depending on specific neighborhood situations and/or community desires. These suggestions are intended to reduce serious light trespass.

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### 6.0 LIGHTING ORDINANCES

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Lighting ordinances or bylaws are a direct result of the growth in the outdoor use of electric light (see **Figure 16**), and perform several important functions. They provide a formal structure by which municipal authorities can evaluate proposed and existing lighting



**Eric Friedli - MAGNUSON PARK: LIGHTING OF BALL FIELDS**

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**From:** <Mikefwmi@aol.com>  
**To:** <eric.friedli@ci.seattle.wa.us>, <cdavid.hughbanks@ci.seattle.wa.us>  
**Date:** 2/28/2002 10:30 AM  
**Subject:** MAGNUSON PARK: LIGHTING OF BALL FIELDS  
**CC:** <Jim.Compton@ci.seattle.wa.us>, <Richard.Conlin@ci.seattle.wa.us>, <Jan.Drago@ci.seattle.wa.us>, <Nick.Licata@ci.seattle.wa.us>, <Richard.McIver@ci.seattle.wa.us>, <Judy.Nicastro@ci.seattle.wa.us>, <Margaret.Pageler@ci.seattle.wa.us>, <Peter.Steinbrueck@ci.seattle.wa.us>, <Heidi.Wills@ci.seattle.wa.us>

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Please see the attached document, which is a letter I've written to express the views of the Windermere North Community Association with respect to the issue of the proposed lighting of the ball fields being planned at Magnuson Park. We are the only community which directly borders the Park, and although we support the plan for the park in general, we are quite concerned about the lighting issue.

I look forward to your timely response to this letter.

Michael Fenton  
President, Windermere North Community Association  
5749 NE 62nd Street  
Seattle, WA 98115

February 28, 2002

Mr. Eric Friedli  
Planning and Operations Director  
Sand Point Magnuson Park  
Department of Parks and Recreation  
7400 Sand Point Way NE  
Seattle, WA 98115

Dear Mr. Friedli:

I am writing to comment on the DEIS for Sand Point Magnuson Park. Our community is the only community that actually abuts the park. The Windermere North Community Association, of which I am president, includes 400 units of student housing for the University of Washington and approximately 125 single-family residences. Our community is located just south of the park's southern boundary.

We consider the park a great amenity for our community. Neighbors walk and play in the park as well as enjoy events that occur there. We look forward to its development in the future. Some of our neighbors have been active in the habitat restoration work on Promontory Point and the planning for the wetlands/sportfield complex and the community garden. We support the overall plan for the park.

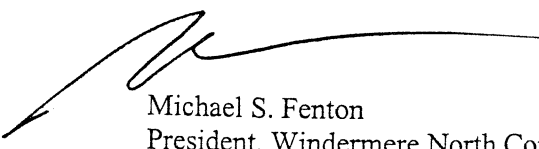
However, we are **not** in favor of the lighting proposed in this document. At the DEIS hearing, the proposed lighting was described as being equal to 2/3 of the lighting at SAFECO field, without walls or a roof. 20% of the lit fields in the city would be on this site! This is an unacceptable burden to put on our community. The impact of this light on the quality of life for those living on the park property will be immense. This has not been adequately addressed in the DEIS. Children's sleep will be interrupted, as well as that of seniors, if the fields are lit until 11 PM 7 days a week. The impact on the wetlands has not been adequately addressed either. Frogs, migratory birds, eagles and voles will all be affected by lights extending beyond the natural dusk. We support the position of the NEDC and favor no lights on the fields.

We're also concerned about the increased traffic and noise that this development will cause. The doubling of the student housing and the new Children's Hospital development has not been assessed in the DEIS, but they should be.

Finally, we're concerned that we will lose the use of the park for neighborhood sports and informal play. We ask that a section of the fields be devoted solely to neighborhood, unprogrammed use. At a Parks Board meeting recently, a Queen Anne resident said her children could no longer play at the nearby park because of league games and fencing. In five years, her two children had not had a game scheduled at this park that is only two blocks from her home. We don't want this kind of situation to be repeated at Magnuson Park.

Thank you for your consideration. I look forward to your prompt response to this letter.

Sincerely,

  
Michael S. Fenton  
President, Windermere North Community Association  
5749 NE 62<sup>nd</sup> Street  
Seattle, WA 98115-7908

1  
S/O1  
S/O4

2  
L&G2  
WDLF1

3  
TRAN1  
4 NOI1  
5  
SEPA5

6  
REC2